

November 18, 2024

**Sent by email to DOER.CPS@mass.gov**

Attn: Thomas Ferguson  
Massachusetts Department of Energy Resources  
100 Cambridge Street, 9th Floor  
Boston, MA 02114

**SUBJECT: 2024 CPS FOLLOW-ON EMERGENCY RULEMAKING COMMENTS**

Dear Mr. Ferguson;

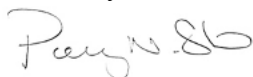
Plus Power extends its appreciation to the Department of Energy Resources (“DOER”) for the opportunity to comment on the Emergency Rulemaking for the Clean Peak Standard (“CPS”) Program, issued on October 11, 2024. Plus Power is a leading developer, owner, and operator of standalone battery energy storage with the 150 megawatt Cranberry Point Energy Storage facility in development in Carver, Massachusetts.

Plus Power supports the proposed changes in the Emergency Rulemaking but requests the DOER clarify whether it intends future programmatic changes moving forward. Battery storage developers designed and sited their systems in anticipation of Clean Peak Energy Credit (“CPEC”) revenue and are depending on regulatory certainty and consistent ongoing rules under the CPS Program. Some projects have been in development for many years to serve the program. The anticipated CPEC revenue is of substantial importance to project economics of battery energy storage.

Plus Power believes the CPS Program is well-designed. Further major modifications could present economic risks to early projects. That could, in turn, threaten the success of many Commonwealth policies and initiatives, including achievement of the Commonwealth’s Energy Storage Initiative and its target of 1000 MWh of energy storage deployment by 2025, the success of the CPS Program, itself, or reaching the Commonwealth’s climate policy target of 50% emissions reduction by 2030.

Thank you for the Commonwealth’s robust support of battery energy storage and the opportunity to provide comment on the design of the Clean Peak Standard.

Sincerely,



Polly Shaw  
Chief External Relations Officer