



March 25, 2022

*Via Electronic Mail*

Samantha Meserve  
Deputy Director, Renewable and Alternative Energy Division  
Massachusetts Department of Energy Resources  
100 Cambridge St., Suite 1020  
Boston, MA 02114  
[DOER.CPS@mass.gov](mailto:DOER.CPS@mass.gov)

**Re: Sunrun Comments on Distribution Circuit Multiplier Straw Proposal**

Ms. Meserve:

Pursuant to the notice issued February 22, 2022 by the Department of Energy Resources (“DOER”), Sunrun Inc. (“Sunrun”) submits the following comments regarding the *Clean Peak Energy Standard Distribution Circuit Multiplier Straw Proposal* (“DCM Straw Proposal”).

Sunrun applauds DOER for its work on the DCM Straw Proposal and supports the inclusion of a locational price signal in the Clean Peak Standard (“CPS”) to incentivize resource deployment in the geographic areas where distributed energy resources such as energy storage, electric vehicles (“EVs”), and electric vehicle supply equipment (“EVSE”) can deliver substantial emission reduction benefits and cost savings in the Commonwealth. Sunrun offers the following observations and recommendation on the DCM Straw Proposal for DOER’s consideration.

As currently proposed in the DSM Straw Proposal, behind-the-meter energy storage and certain standalone energy storage systems are the only resource types eligible for the DCM on distribution system circuits with high solar photovoltaic (“PV”) resource saturation. By limiting DCM eligibility on these saturated circuits to only energy storage resource types, the DCM Straw Proposal fails to recognize the ability of EVs and EVSE to, among other things, avoid new

investments in grid infrastructure and allow for better integration of solar generation resources.<sup>1</sup> As such, Sunrun recommends that the DCM Straw Proposal be modified to explicitly allow EV and EVSE deployed on circuits with high solar PV saturation to qualify for the DCM.

EVs and EVSE are flexible assets that can operate in a manner similar to energy storage by providing EV charging load during midday hours when solar PV energy production is high, thereby reducing the amount of excess solar production exported to the grid and shifting charging load away from the seasonal peak periods that occur in late afternoon and evening hours. A recent modeling study sought to assess the ability and role of EVs in managing resource curtailment in a grid with high solar PV saturation. Analysis results allowed researchers to conclude that the use of EVs as mobile storage resources had a “significant impact” on reducing solar curtailment and “EV as storage is ideal for regions experiencing curtailment due to mismatch of supply and demand”<sup>2</sup>

Sunrun appreciates the opportunity to provide these comments and looks forward to continued collaboration with DOER and stakeholders on the development of the DCM Straw Proposal and overall CPS program.

Respectfully submitted,

/s/ Chris Rauscher

Chris Rauscher

Senior Director, Market Development & Policy

Sunrun Inc.

225 Bush St., #1400

San Francisco, CA 94104

Tele: (207) 400-1150

Email: [chris.rauscher@sunrun.com](mailto:chris.rauscher@sunrun.com)

---

<sup>1</sup> Chris Nelder, James Newcomb, and Garrett Fitzgerald, Electric Vehicles as Distributed Energy Resources (Rocky Mountain Institute, 2016) at 6. Available at: [http://www.rmi.org/pdf\\_evs\\_as\\_DERs](http://www.rmi.org/pdf_evs_as_DERs).

<sup>2</sup> Samuel M.G. Dumlao and Keiichi N. Ishihara, Impact assessment of electric vehicles as curtailment mitigating mobile storage in high PV penetration grid (Energy Reports, Volume 8, April 2022) at 743. Available at: <https://www.sciencedirect.com/science/article/pii/S2352484721013688>