

July 27, 2018

SENT VIA ELECTRONIC MAIL

Department of Energy Resources
100 Cambridge Street Suite 1020
Boston, MA 02114

Re: Comments on Energy Storage Guideline and SQA Guideline Drafts

To whom it may concern,

Please find the enclosed comments from SunRaise Investments, LLC (SunRaise) on the SMART program draft guidelines for Energy Storage and the Statement of Qualification Reservation Period.

SunRaise appreciates the opportunity to comment and would like to thank the Department of Energy Resources (DOER) for its continued stakeholder engagement in this process and its efforts in developing and administering effective solar programs in the Commonwealth.

Energy Storage

Minimum and Maximum Nominal Rated Power

Note 1: The definition states “The nominal rated power capacity of the Energy Storage System paired with the Solar Tariff Generation Unit must be at least 25%.”

DOER should clarify in the final guideline that the nominal rated power capacity of the Energy Storage System must be at least 25% of the Solar Tariff Generation Unit’s capacity, in **direct current**. The draft guideline seems to suggest that this is the case but it is not a perfectly clear definition.

Operational Requirements

Note 2: The definition states “If the Energy Storage System is decommissioned or non-functional for more than 15% of a rolling year, the Department may disqualify the Solar Tariff Generation Unit from continuing to receive the energy storage adder.”

For purposes of clarity, DOER should expand upon what it means by “non-functional”. Does “non-functional” mean not operating at all, or does it equate to not having the potential to operate? Does this mean that the ESS must operate for 15% of days (or 55 days rounded) throughout a rolling year?

It would be useful to explain this operational requirement with an example.

Rationale and Adder Formula

Note 3: One page 5 of the draft guideline, DOER references the calculator it created to determine the potential value of an applicant’s energy storage adder. That calculator is titled as

“DRAFT” and it would be beneficial for DOER to clarify whether this calculator will be updated or if the current calculator, dated 1/22/18, is final and sufficient for stakeholders to use today.

Energy Storage Guideline Appendix: Examples

Note 4: While the examples provided give stakeholders some additional context, they could be clarified further.

Example 1 compares the 7.6 kW AC capacity of the inverter with the 5.8 kVA of the ESS. In example 2 and example 3, the kVA Rated AC Power Output of the inverter is compared with the 5 **kW** Max Charge/Discharge Power of the ESS. The nominal rated power capacity of an ESS is defined as the “limiting continuous apparent power rating (**kVA**)”, however these examples compares a value in kVA to a value in kW for this purpose. In example 1 the kW of the inverter is compared with the kVA of the ESS, and in examples 2 and 3 the kVA of the inverter is compared with the kW of the ESS.

In example 4, the kVA of the ESS is provided but there is no capacity listed (in kW or kVA) for the solar inverter.

While the examples serve the purpose of providing different scenarios to stakeholders, their current form creates confusion. DOER should review and revise these examples with an expert on solar and ESS design to ensure the examples in the final guideline are clear, consistent, and provide stakeholders with accurate information to determine the design of their solar and ESS projects.

Lastly, each of the examples states “resultant Energy Storage Adder if in Block 1”. This should state “resultant Energy Storage Adder if in Tranche 1” to avoid confusion between Blocks and Tranches.

Statement of Qualification Reservation Period

Off-taker Based Adders

Note 5: Section 8.b.ii states “A Solar Tariff Generation Unit may change an Off-taker Based Adder one time during its tariff term.”

Please clarify what would occur if an STGU initially qualifies for a CSS adder and loses or electively removes its CSS adder. Is this STGU now unable to later qualify for the CSS adder in its SMART tariff term?

For example, if an STGU initially received the CSS adder and during the tariff term it lost the adder due to off-takers dropping out of the STGU’s allocation, could the STGU temporarily switch to be a Qualifying Facility and then later re-qualify for the CSS adder?

Conclusion

We thank you for the opportunity to comment on these guidelines and your continued work in bringing solar energy to the Commonwealth, which has had significant environmental and economic benefits.