

Comments on "Guideline on Energy Storage", revised May 18, 2020

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To: SMART, DOER (ENE) <doer.smart@mass.gov>

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Dear Sir or Madam,

Our grid needs more solar and more storage. Having said that, requiring energy storage and solar be co-located is not an effective way to achieve needed change.

Storage siting is different from solar siting. Forcing solar siting and storage siting into one process will produce inferior outcomes versus allowing sites to be identified separately. Especially, requiring co-location will disqualify very good solar sites that should be developed (e.g., solar permits will be denied due to storage toxicity and fire risks that otherwise-willing municipalities would approve). In addition, the requirement to co-locate will direct market resources away from developing attractive storage sites that are not suitable solar sites (e.g., basements in congested, urban areas of the grid).

Incentivize storage? Yes. Incentivize co-location of solar and storage? Sure. Require storage be colocated with solar? Please, no.

Thank you for your work to improve our energy systems. I hope you can accommodate this comment.

Best,

Malcolm

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