



Via Electronic Mail

March 5, 2021

Abby Barnicle, Renewable Energy Program Coordinator
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: ENGIE North America, Inc., Comments on the Draft Guideline on Energy Storage

Dear Ms. Barnicle,

ENGIE North America, Inc., ("ENGIE") appreciates the opportunity to provide comments to the Department of Energy Resources ("Department") on the Draft Guideline on Energy Storage issued on February 12, 2021. Specifically, ENGIE would like to provide the following comments on the Department's proposal that will permit the full compensation of standalone DC-coupled solar-plus-energy storage under the Solar Massachusetts Renewable Target ("SMART") program.

Over the fall of 2019 and early winter 2020, DOER held nine conference calls with significant stakeholder participation. Stakeholders included the Electric Distribution Companies ("EDCs"), ISO New England Inc. ("ISO New England"), the Solar Program Administrator, and members from industry. Following a pause due to the impacts of COVID-19 the stakeholders recommenced discussions in the fall of 2020. The series of discussions resulted in stakeholder agreement on a formula to compensate standalone DC-coupled solar-plus-energy storage projects for lost revenue due to battery round-trip efficiency ("RTE") losses.

The final formula was the result of sustained stakeholder engagement and cooperation over many months. ENGIE would like to thank the Department for the pivotal role it played in shepherding the discussions to a successful conclusion. ENGIE supports the proposed changes included as they appear in the Draft Guideline on Energy Storage and recommend that the Department adopt the changes without delay.

Thank you for your consideration of these comments. Please contact me with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "SBS", with a horizontal line extending to the right.

Sarah Bresolin Silver
Director, Government and Regulatory Affairs
ENGIE North America, Inc.
sarah.bresolin@engie.com