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Feedback on project scope for Section 80 Storage Study

Scope and Objectives

Recognizing that long-duration energy storage (LDES) has the potential to replace existing fossil fuel generators and other emitting infrastructure, and acknowledging that those polluting resources are disproportionately located in or near Environmental Justice communities, the study should explore ways to prioritize LDES deployment to reduce local air pollution rapidly and effectively.

Consider locating LDES at every electrical substation, to take advantage of existing distribution infrastructure.

Consider a mix of large/medium/small LDES units, widely dispersed and strategically located to optimize grid performance while speeding the transition to renewable energy sources. Taken as a whole, the placing of multiple LDES should reduce stress on overburdened parts of the grid while minimizing the need for grid upgrades and adding resiliency by creating networked virtual power plants.

Prioritize technologies that use non-toxic, Earth-abundant, recyclable materials that can be sourced according to high environmental standards from North American suppliers.

Propose incentives for installing LDES both front-of and behind-the-meter, and consider scenarios in which these different schemes would best serve the public interest and the state's emissions reduction targets.

Thank you for careful consideration of our comments,

A handwritten signature in blue ink, appearing to read "Jane Winn".

*Jane Winn, Executive Director
Berkshire Environmental Action Team*

A handwritten signature in black ink, appearing to read "Rosemary Wessel".

*Rosemary Wessel, Program Director
No Fracked Gas in Mass, A Program of Berkshire Environmental Action Team*