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Thank you for the opportunity to provide comments on the draft *Municipal Aggregation Manual & Best Practices Guide*. Generally, the Guide is well developed, clear, and useful to the aggregation community. My comments pertain more to what might be missing from the Guide.

In Section 3, the Guide provides important reasons why municipalities and their communities may want to consider a municipal aggregation, the importance for goal setting, and helpful list of potential advantages and challenges.

The experience of the Clean Energy Extension (CEE), in working closely with communities around the Commonwealth, is that there is growing awareness and interest in municipal aggregations that directly support locally sited and owned renewable energy and energy storage, in ways that directly serve their local greenhouse gas reduction and local renewable energy goals, achieve energy price security, and reduce peak loads. This use of municipal aggregation goes further than “purchasing Class I RECs” to green the municipal supply by engaging communities, through their aggregations, directly into energy planning and decision making, and in supporting the local development of clean energy assets.

CEE has served as a technical advisor to the Western MA Clean Energy Choice (now Valley Green Energy) which worked for over two years to design a municipal aggregation across three towns to achieve these goals, with mixed success.

There remains substantial uncertainty regarding the willingness or ability of the DPU to approve municipal aggregations that include such “local” goals and strategies in their design. As this interest will continue to emerge and grow, it would be helpful for the DOER Guide to 1) address the limitations of the enabling statute and regulations on these issues, and 2) offer best practices on how an aggregation might accomplish these goals.

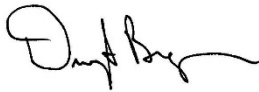
Sample ideas along these lines that need clarity and guidance include:

- What are opportunities for an aggregation to include an *operational adder* to facilitate the financing of community- or aggregation-owned renewable or storage assets?
- How might an aggregation think about contracting directly for energy and RECs from a local renewable energy project?

- What are the limitations and guidance concerning an aggregation potentially including an operational adder that is used to (1) fund a community program to increase low-income access to Mass Save energy efficiency programs, or (2) to realize efficiency strategies to reduce peak demands?
- If peak demands are strategically reduced, leading to better energy supply contracts, how might an aggregation retain part of this difference to invest further in such clean energy strategies?

Thank you for the opportunity to share these comments. Please reach out if any questions or to discuss further.

Regards,



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