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December 9, 2022

Marian Swain
Deputy Director of Policy and Planning
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor, Boston, MA 02114

Dear Ms. Swain,

Thank you for providing the draft *Municipal Aggregation Manual and Best Practices Guide* for public comment. I am writing on behalf of the Valley Green Energy Working Group which is comprised of staff from the Town of Amherst, City of Northampton and Town of Pelham as well as constituents of each community. Our response is a result of our fairly recent experience in developing an inter-municipal community choice aggregation (CCA) over the past few years.

First and foremost, we applaud the development of this guide. It is important for communities, especially those with limited staff resources, to have a clear and concise document that offers support in moving municipal aggregation forward. However, we hope that this guide could also address what might be possible, and the future direction of CCAs in addressing climate change and reducing carbon emissions.

It has been our desire in creating an inter-municipal CCA to move beyond the standard approach of purchasing Class I RECs as the primary means of greening our electricity load. Our efforts have looked to incorporating distributed energy resources (DER) through locally sited and owned renewable energy, paired with energy storage, as a way in which local municipalities could achieve the dual benefit of more control over their electricity supply while at the same time meeting local renewable energy goals.

Our hope is that the guide will include the statutory and regulatory restrictions that currently serve as limitations in moving localized DER forward and how CCAs might be used to actually accomplish these goals with recommended best practices. We offer the following that were provided by Dwayne Breger, our partner from the University of Massachusetts Clean Energy Extension (CEE):

- 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, (2) to realize efficiency strategies to reduce peak demands or (3) support low carbon transportation?

- If peak demands are strategically reduced, leading to better energy supply contracts, how might an aggregation think about contracting directly for energy and RECs from a local renewable energy project?

Thank you again for the opportunity to provide comment.

Sincerely,



Stephanie Ciccarello, Amherst Director of Sustainability
on behalf of the Valley Green Energy Working Group:

Carolyn Misch, Direct of Planning and Sustainability, City of Northampton

Chris Mason, Energy and Sustainability Officer, City of Northampton

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