



HEARTWOOD GROUP, INC.

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2-5-19

Massachusetts DOER
100 Cambridge Street, Suite 1020
Boston MA 02114

Re: Clean Peak Standard
Via e-mail to doer.cps@mass.gov.

Dear DOER CPS Folks,

In answer to your questions:

1 & 2) Only resources located within state boundaries should qualify.

3 to 8) Any non-polluting resource that can be credibly shown to reduce peak demand on the electrical system should qualify.

24 to 28) A single provider could be acceptable as the recording or verifying provider, similar to how the NEPOOL GIS system records RECs. However, in general, the measuring and collecting of data for this purpose as well as for general utility billing purposes should be a competitive business open to any party that can accurately collect and deliver metered data according to ANSI C-12 standards.

31) Much like ISO markets for capacity, energy, etc., compensation should be available for any qualified market participant to be compensated through a reverse auction type system that is based on the fair and complete valuation to rate payers of reducing peak demand. See Acadia Center Value of Solar Study for a good example for values that should be included in calculating value to be compensated.

I hope this is helpful in your program development. Thanks for inviting stakeholder feedback.

Sincerely,

Fred Unger,
President