



SUBMITTED ELECTRONICALLY

July 15, 2025

Mr. Thomas Ferguson
Massachusetts Department of Energy Resources
Thomas.Ferguson@mass.gov

Re: Comments by Clean Energy Group (CEG) Regarding the Advancing Massachusetts Power straw proposal

Dear Mr. Ferguson:

Clean Energy Group (CEG) is pleased to submit these comments to the Massachusetts Department of Energy Resources (DOER) in response to DOER's request for comment regarding the AMP straw proposal.

Clean Energy Group (CEG) is a leading national nonprofit advocacy organization dedicated to advancing innovative technical, economic, and policy solutions that ensure equitable participation in the clean energy transition. It should be noted that these comments are submitted by CEG staff and do not necessarily reflect the views and opinions of its funders.

In addition to our comments recently provided verbally to DOER staff, we would like to comment in writing on Question 1. Are there any program areas currently not included that you feel should be included? If so, what are those areas and why should they be included?

One additional area that should be included is equitable battery-based virtual power plants. This would fall into the Community Resilience category of the AMP grant program.

The Commonwealth of Massachusetts was among the first states to develop a battery VPP program (ConnectedSolutions, offered statewide beginning in 2019). This program model has been very successful; there are now similar programs in at least 23 states, plus Puerto Rico. However, the Massachusetts ConnectedSolutions program has not evolved in some important areas since its inception. Notably, it still does not offer equity programming for income-eligible (or otherwise underserved) battery customers. Other states have advanced beyond the basic ConnectedSolutions model, to incorporate equity provisions; for example, the Connecticut Energy Storage Solutions program offers a robust equity carve-out and incentive adder alongside its market-rate offerings.

Fortunately, an advanced and equitable program model does exist in Massachusetts. The Cape & Vineyard Electrification Offering (CVEO) combines BTM electrification, solar, battery storage, and efficiency in a VPP format, allowing Cape & Vineyard Electric Cooperative to dispatch aggregated

behind-the-meter resources for peak demand reduction services. Importantly, the program has a strong equity focus, and yet achieves positive net benefits for ratepayers. Unfortunately the CVEO is available only in the Cape Cod territory serviced by Cape & Vineyard Electric Cooperative, and is limited to 100 households.

A second, similar pilot program was recently proposed by Generac, a private firm. Generac was awarded a federal GRIP grant to develop a battery+electrification offering for 2,000 LMI customers in Massachusetts, in collaboration with the sponsors of Mass Save; but the viability of the Generac program is now in question due to federal funding clawbacks.

The solar+storage+electrification VPP is an innovative program model that should be offered statewide. Including it in the DOER AMP program would help to advance an energy storage model that combines equity, community benefits, ratepayer savings, grid benefits, efficiency and decarbonization, and would demonstrate the benefits of combining small, aggregated BTM solar+storage with electrification and controllable loads to optimize benefits to the grid and the community.

For more information on the CVEO, please see CEG's recent report, "Solar+Storage+Electrification: A Clean Energy Equity Model for Massachusetts," which can be downloaded here:

<https://www.cleangroup.org/publication/solar-storage-electrification-cveo-massachusetts/>.

CEG commends DOER on its work in developing the AMP straw proposal. CEG will be happy to discuss or answer questions about these comments with DOER upon request.

Respectfully submitted,



Todd Olinsky-Paul
Senior Project Director
Clean Energy Group