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January 19, 2024

via email

Massachusetts Department of Environmental Protection
100 Cambridge Street Suite 900
Boston, MA 02114

Re: Stakeholder input to inform the strengthening of the Clean Energy Standard (CES)

Dear Commissioner Heiple:

Acadia Center appreciates the opportunity to provide feedback on the Discussion Document released by the Massachusetts Department of Environmental Protection (MassDEP) describing potential options to strengthen the Clean Energy Standard (CES). As the Discussion Document notes, this supplemental program review is timely given the significant policy and planning actions that have taken place in the preceding three years. The CES remains an important policy for both the Commonwealth and the region at large, and indeed beyond New England as pertains to collaboration and cooperation with neighboring jurisdictions in New York and Canada. As we outline further below, Acadia Center urges MassDEP to use this program review as an opportunity to further synchronize the role played by the CES with similar energy portfolio standards and procurement frameworks in place across the Northeast U.S. and Eastern Canada, as a means of organizing and catalyzing the significant build-out of renewable and clean energy resources that will be needed to achieve the Commonwealth's Clean Energy and Climate Plan for 2025 and 2030 (2025/2030 CECP), the 2050 CECP, electric power subsector GHG emissions targets in 2025 and 2030, and beyond.

We look forward to working with DEP and to digging in more deeply to analyze the options put forward by the Department and the potential resulting impacts of the CES, throughout the remainder of 2024 and beyond.

Overview of Initial Comments

Acadia Center is pleased to provide comments and recommendations to the Department in response to the CES Discussion Document, released in late 2023. We note at the outset that we have also contributed to and signed a separate set of comments on behalf of the Northeast Grid Planning Forum (NGPF), which we co-convene with Nergica (discussed in more detail below). Those comments reinforce many of the comments offered below regarding long-term planning and regional/interregional coordination. However, this set of comments from Acadia Center also elaborates further on a number of other more granular elements of DEP's Discussion Document.

In the sections below, Acadia Center's initial comments focus on five main categories of recommendations and input.

- Recommendations pertaining to long-term planning and regional/interregional coordination;
- Alternative Compliance Payment (ACP)-related options and impacts of policy changes on affordability;
- Proposed new/recent project requirements option and ways for the CES to drive additionality;
- Proposed options regarding ensuring clean energy delivery when it is needed; and
- Feedback on resource eligibility questions vis-à-vis emissions-related stringency, plus other miscellaneous recommendations and reflections.

All of our comments are tied together by an over-arching desire to help the Department refine the CES so as to drive greater clean energy adoption and additionality while maximizing affordability for ratepayers through the benefits of regional coordination and long-term planning.

Main Comments and Recommendations

Acadia Center provides the following comments and recommendations to the Department in reaction to the released Discussion Document, categorized by topic and theme.

Long-Term Planning and Regional/Interregional Coordination

Acadia Center supports the option proposed by MassDEP to require long-term planning around the CES, and we recommend that a regional (and even inter-regional) planning approach be pursued to the greatest extent possible. The Department wrote that it could amend the CES to add some form of planning requirement, such as requiring that a portion of the CES obligation be met via multiyear contracts with clean energy generators, including through an organized regional or Massachusetts-specific auction process. While the description of this option is high-level and many design details would need to be addressed, we believe this model could be very promising for the Department to pursue and develop working in tandem with neighboring jurisdictions and ISO-New England (as well as sister agencies in Massachusetts).

As the Department is likely aware, the CES in place in New York State essentially provides this centralized, long-term planning function for the analogous renewable energy deployment mandates currently in place there (for NY: achieving 70% renewable electricity by 2030).[1] In New York, the CES is the umbrella policy covering all renewable resource types, both existing and new, and it has driven essentially all of the ongoing procurements of renewable energy attributes toward fulfillment of the 70-by-30 target and its component tiers since replacing the predecessor Renewable Portfolio Standard (RPS) regime in New York (in ~2016). The NY CES is administered by NYSERDA (the "big buyer") and overseen/approved by the New York State Public Service Commission (PSC), and it functions in a manner similar to what MassDEP appears to be describing in this option.

Through a robust planning proceeding,[2] New York established an estimate of grid demand in the planning year (2030), established a baseline of existing renewables in place and operating, and determined the gap between that baseline and the 2030 compliance obligation that would need to be met with contributions from newly procured eligible resources. Once that gap was identified, New York was then able to lay out a specific frequency and volume of procurements by tier/resource type, which NYSERDA has been conducting annually via RFP since the approval of the CES in 2016 – including regular separate solicitations for large-scale land-based renewables (mostly solar/wind and some small hydro) and offshore wind projects. These auctions result in the award and execution of long-term contracts (20-25 years) with new clean energy generators for the purchase of renewable energy certificates (RECs), which together are envisioned to fulfill the lion's share of the 2030 compliance obligation – factoring in relatively small but meaningful contributions from distributed solar and other smaller-scale resources.

In light of this model, Massachusetts would be well served by exploring, developing, coordinating, and potentially integrating a comparable CES procurement framework and auction/RFP process for Massachusetts, New England, and beyond. Although New York has, like the rest of the region, endured significant issues relating to the economic viability of specific project contracts resulting from CES procurements, the overarching CES framework has demonstrated itself to be a highly effective platform for organizing market participation and driving new resource investments, using a competitive process to deliver savings and economies of scale for ratepayers. Massachusetts has fortunately already shown a willingness to engage in multistate procurements, as evidenced in the recent joint offshore wind procurement framework with Rhode Island and Connecticut (among other prior tri-state procurement efforts).

Going forward, an updated CES with long-term planning requirements, a centralized auction process, and a contracting framework could be one means of cementing this type of multi-state/regional collaboration around procurements – potentially by working in harmony with the RPS in Massachusetts and other states. This type of approach would require some degree of reconciliation or agreement between states with RPS/CES regulations that vary slightly in many ways, including with respect to resource eligibility and project vintage. This approach would also require a significant administrative apparatus for solicitations and contracting, and we recommend that it may be most efficient to align those

[1] See NYSERDA CES webpage: https://www.nyserda.ny.gov/All-Programs/Clean-Energy-Standard.
[2] See New York State Public Service Commission (PSC) - Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard, available at: https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=15-e-0302. See also 2020 Clean Energy Standard Order: https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={EAAF1A1E-2A05-49A7-A4D1-C5755E5BE536}.

administrative activities with those already in place through the DOER-led procurements primarily oriented around fulfillment of the RPS.

Across the wider region, we urge that MassDEP and the Healey-Driscoll Administration think broadly about opportunities to engage with other jurisdictions in the region on grid planning and coordination. Of relevance, Acadia Center is the U.S. co-convenor of the Northeast Grid Planning Forum (NGPF), which is a deliberative stakeholder dialogue designed to formalize and deepen collaboration across northeast U.S. states and Canadian provinces around interregional energy system and grid coordination. The dialogue will be convened via three distinct roundtable processes: 1) environmental justice and community mobilization, 2) interregional planning, and 3) clean energy procurement and market development. Working together and in close coordination with civil society, labor and industry, participating jurisdictions will create and deploy a shared policy, legal, regulatory and market/tariff toolset. We intend for this toolset to advance the development of the next-generation power network that will serve as the backbone of the energy transition across the region, capturing the climate, clean energy procurement and consumer benefits of grid integration. While this Forum is nascent, we offer it up to MassDEP and sister agencies as a resource for thinking about the CES and broader energy system planning priorities in a regional and interregional context. Given the existence of certificate markets, procurement frameworks, and opportunities for new transmission to expand inter-tie capacity between regions, it is vital that the ongoing design and development of the CES factor in Massachusetts' role within not only its regional transmission organization (RTO) but the even broader Northeast Power Coordinating Council (NPCC) cross-border region.

In Massachusetts' own long-term climate plans and decarbonization roadmaps, the importance of this regional planning and coordination is already abundantly evident. Two headline takeaways from the Energy Pathways to Deep Decarbonization[3] technical report are worth underscoring:

- *"Expanded transmission capacity between Quebec and Massachusetts was important in all pathways, with a minimum of 2.7 GW and a maximum of 4.8 GW required above today's level. In the near term, these lines were used to import carbon-free electricity from Quebec, largely from new onshore wind projects. In the long term, the lines were used to allow bi-directional power flow for balancing a high renewables power system throughout the Northeast region."*
- *"New inter-regional transmission was a critical part of all pathways because of its importance as a balancing strategy in high renewables systems. Its value stems from three factors: weather diversity across zones, complementary resource endowments, and the flexibility of the Quebec hydro system."*

As a final set of evidence about the merits of this regional/interregional approach, independent studies have shown that there are enormous mutual benefits to northeast provinces and states in supplementing the current piecemeal approach to developing and managing energy systems with an approach rooted in mutual cooperation.[4] We and our partners in NGPF

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[3] See Energy Pathways to Deep Decarbonization Technical Report, available at: https://www.mass.gov/info-details/ma-decarbonization-roadmap.

[4] "Economic, Reliability, and Resiliency Benefits of Interregional Transmission Capacity: Case Study Focusing on the Eastern United States in 2035," GE Energy Consulting, 2022. https://www.nrdc.org/sites/default/files/ge-nrdc-interregional-transmission-study-report-20221017.pdf.

"National Transmission Needs Study," U.S. Department of Energy. October 2023. https://www.energy.gov/sites/default/files/2023-10/National_Transmission_Needs_Study_2023.pdf.

"2050 Transmission Study," Reid Collins. 18 October 2023. https://www.iso-ne.com/static-assets/documents/100004/a05_2023_10_19_pspc_2050_study_pac.pdf.

Cowart, Richard et al, "A Collaborative for Greater Coordination and Integration Among the Electric Grids of Eastern Canada and the Northeastern United States: Assessment and Recommendations," Regulatory Assistance Project, Raab Associates, Ltc, and The Transition

believe that collaboration on energy system planning across the international border and between grids is an untapped opportunity in the decarbonization toolkit, one that can advance reliability, load balancing, and cost improvements on both sides of the border. Frameworks for cross-border cooperation already exist: the NPCC ensures grid reliability across the region; Ontario and Québec have launched grid planning discussions, and a DOE-Northeast States Collaborative is in formation; some western Canadian provinces are already engaged in limited cross-border planning activities; Saskatchewan recently joined the Southwest Power Pool (SPP), and Manitoba is a member of the Midcontinent System Operator; and British Columbia is a member of the SPP Markets+ initiative and the Western Electricity Coordinating Council. The Department can and should be informed and inspired by these fruitful collaborations to more centrally consider opportunities for the CES to drive such regional and interregional linkages and outcomes.

Alternative Compliance Payment (ACP) Provisions and Affordability

The Department also proposed a set of options related to the ACP levels in effect for the CES program, as well as for the use of CES ACP proceeds. Of course, we support program design refinements that help ensure that there is enough clean energy in future years to avoid over-reliance on ACPs, but the setting of the ACP level does itself have meaningful impact on the CES certificate market as a whole and in comparison to the RPS and other similar markets. For that reason, we do generally support DEP's proposed option to raise the ACP rate for the CES as a means of supporting development of additional clean energy. This is relevant both for the resultant market prices of certificates and to ensure a robust pricing window for competitive bidding in any future CES procurements, rather than effectively capping future bids at the outset at the current low ACP rate. Competitive bidding and long-term contracting can therefore provide important cost containment functions for the CES rather than exclusive/primary reliance on ACP rates. See below for further discussion of affordability and impacts on electricity rates.

Secondly, as the Discussion Document observes, there is also an important regional benefit in raising the CES ACP level, with positive implications for Massachusetts as well. To remedy the currently fragmented certificate markets in the Northeast, raising the CES ACP to a level consistent with other regional programs would have the benefit of aligning these respective state-based markets, giving better certainty to renewable developers pursuing projects in the region, and preventing year-to-year swings in compliance across jurisdictions based on mismatches between ACP rates. We also agree with the Department that raising the ACP rate would ensure that when the regional supply of clean energy increases due to Massachusetts' clean energy contracts, the increase in regional supply is fully counted toward Massachusetts' clean energy goals rather than those of other states that have similar programs with higher ACP rates. This will undoubtedly be important for Massachusetts in the context of accounting for progress and documenting achievement of electric-sector and economy-wide emissions reductions targets. However, depending on the level of the CES ACP increase vis-à-vis other states in the region, parallel action may also be needed to increase the Massachusetts RPS ACP rate as well, given that three other states currently have ACP rates exceeding the RPS Class I ACP rate.

With respect to the Department's proposed options for dedicating CES ACP funds to supporting new CES-eligible projects, Acadia Center is generally supportive of the Department exploring these tweaks around the use of ACP funds. Offering competitive grant opportunities to new CES-eligible projects appears to be a positive use of ACP funds; however, the amount of these funds is typically small (relative to the overall market) and may vary from year to year, making the opportunity presented by these grants more limited and uncertain to the market. So, it may be easier and less administratively burdensome for MassDEP to use ACP revenues to purchase additional CECs (above the CES requirement) in future years, including when CECs may be available at lower prices.

Regarding overall affordability and ratepayer impacts, Acadia Center is very closely focused on understanding and minimizing any potential impacts of policies on bills for electric ratepayers. This is true both for the CES as well as for other

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Accelerator. 5 October 2020. https://www.raponline.org/wp-content/uploads/2023/09/rap-collaborative-greater-coordination-integration-electric-grids-eastern-canada-northeastern-united-states-2020-october.pdf.

Dimanchev, Emil, Joshua Hodge, and John Parsons, "Two-Way Trade in Green Electrons: Deep Decarbonization of the Northeastern U.S. and the Role of Canadian Hydropower," MIT CEEPR Working Paper 2020-003. https://ceepr.mit.edu/wpcontent/uploads/2021/09/2020-003.pdf.

programs being designed/considered by the Department, including the Clean Heat Standard (CHS). Massachusetts must ensure that electricity rates remain affordable to customers, both in general and as compared to fossil fuel alternatives, as they consider adopting heat pumps, EVs, and other electric technologies that will tend to increase their electricity consumption. Rapid adoption of these technologies is, of course, vital to the achievement of the Commonwealth's sector-specific and economywide emissions reductions mandates, and as a result, policies designed to drive emissions reductions in one-sector – like the CES – must not unintentionally and indirectly stymie that adoption in other sectors through overly onerous upward pressure on electric rates.

Given this imperative, we provide our general support for the Department's proposed ACP options with the addendum that the Department must 1) ensure the resulting program is not at risk of being overly costly, and 2) prevent undue electric rate impacts. Given the number of active policymaking activities happening concurrently, there should be an ongoing, holistic review of affordability with respect to not only the CES but the RPS and CHS, as well as the analysis underway before the Department of Public Utilities (D.P.U.) and DOER/MassCEC. Again, we do believe that new program design elements like long-term contracting and competitive procurements can and will help insulate ratepayers from undue bill impacts and year-to-year swings in compliance costs. But the over-arching priority of affordability remains true even as we look to accelerate deployment of new clean energy to fulfill and exceed the CES.

New/Recent Project Requirements and Additionality

DEP raises the potential option of adding a 'vintage requirement' for the CES, which would require that a fraction of each year's compliance obligation be met with credits from projects with a commercial operation date in the prior three years and which would include a relatively high ACP rate to allow new projects to quickly recoup construction costs. While we understand the objective behind such a proposal, we have questions and concerns about the feasibility and efficacy of this option given the prevailing models for large-scale renewable resource procurement that have evolved in the region. Project development and financing for new large-scale generation facilities have oriented around the much longer-term contracting periods of 10-20 years, and even for smaller-scale resources (e.g., behind-the-meter [BTM] and community solar), the approaches taken in Massachusetts in recent years have also evolved toward a longer-term stream of tariff-based incentive payments (under SMART).

For these reasons, we have doubts that a three-year period of eligibility for more remunerative Clean Energy Credits would be able to attract and sustain the requisite interest and financial investment to drive new projects forward. It's not clear if the Department envisioned these elevated ACP rates to be high enough to *fully* recoup project construction costs and Internal Rate of Return (IRR), but it would seem likely that the ACP rates would need to be considerably higher than normal – thereby posing a potential risk of compliance costs being concentrated in a short period of time. In our view, it would be more prudent to stay with a longer-term contracting and eligibility period as a means of spurring new project additions (in line with our comments above regarding long-term planning and regional coordination) and avoid further complicating the already highly segmented CES-RPS framework with a new "recent vintage" sub requirement.

Ensuring Clean Energy Delivery "When It Is Needed"

The Department also provides an option related to improving temporal matching under the CES, intended to address the fact that clean electricity counted under the CES does not currently need to be generated when there is corresponding demand for electricity in Massachusetts. DEP proposes multiple solutions, including i) preventing generation delivered during periods of negative wholesale LMPs from receiving CECs, and ii) implementing quarterly or monthly compliance periods, to better match the timing of supply with the timing of electricity sales/demand. There may be value in exploring these approaches further, with some modifications and qualifications. In general, changes to disincentivize delivery during periods of negative LMPs would be a positive boost to energy storage technologies (defined broadly – including electric, chemical, and thermal media) and to other sources of flexible demand (e.g., EV charging, electric hot water heaters, etc.), sending a signal to project developers to consider adding storage to their clean energy projects or partnering with storage providers and end-use customers or aggregators to ensure sufficient demand can be there to match supply. However, such a policy would need to be designed to prevent generators from simply curtailing their clean energy deliveries, which – even during periods of negative LMPs – can provide value to the grid and to neighboring control areas via export. Any program changes to effectuate this objective must also not be in conflict with other existing storage programs and policies.

We do note that other policy mechanisms have been pursued and may also provide an effective means of driving this type of improved temporal matching, including the Clean Peak Standard, although these are generally geared more toward the flipside of the challenge – ensuring clean energy is there during peaks in demand rather than avoiding less valuable clean energy deliveries during troughs in demand. Storage and flexible demand resources, of course, can address both sides of this equation by shifting their charging/discharging and consumption accordingly. As a result, this may be an instance where a 'both-and' approach is warranted, especially if CES provisions can help give a longer-term signal for the multi-day and seasonal balancing needs foreseen down the line as penetration of variable renewable resources increases. In the years ahead, this signal may be relevant for increasing '24/7' clean energy matching efforts and could potentially evolve into the CES serving as a procurement and attribute mechanism for so-called "dispatchable, emissions free resources" (or DEFRs), which will likely be needed to provide supply on a small number of days each year during periods of extended dips in production from wind and solar resources.

With respect to DEP's proposal to consider establishing quarterly or monthly compliance periods, we have some questions on the feasibility and administrative burden of such a construct, at least for the program as a whole rather than within a contracting/procurement framework. However, DEP is right to consider the relationship between periods of negative LMPs and compliance periods as related levers for improving temporal matching. In further exploring these design options, MassDEP may find it valuable to consider relevant provisions contained in some of the recent renewable procurements from around the Northeast, which may prove informative for purposes of CES program design, especially if auctions and contracting are seriously pursued. These include:

- **Multiple New England procurements**: Many of the recent regional RFPs include language similar to "in the event that the LMP for the Qualified Clean Energy at Delivery point is less than $0.00 per MWh in any hour, then the Buyer will purchase the Delivered Energy and or RECs at the contract rate and the seller shall credit to buyer, on the appropriate monthly invoice, an amount equal to the product of (i) such Qualified Clean Energy Delivered in each such hour and (ii) the absolute value of the hourly LMP at that Delivery point." As a result, contracted generators are already on the hook to pay utilities/counterparties back for the simple absolute value of negative LMPs during hours of delivery.[5]

- **MA/RI/CT Tri-State Procurement**: The Tri-State RFP required Eligible Bidders to provide a schedule of Qualified Clean Energy Deliveries with their bid. The Soliciting Parties sought firm delivery commitments of Qualified Clean Energy Deliveries particularly during on-peak hours in peak demand periods, i.e. the five peak months of January, February, July, August, and December. On-peak hours were defined as hours ending 0800 to hour ending 2300 on Monday through Friday, excluding NERC holidays.[6]

- **Massachusetts 83D procurement**: Section 83D required the bidder to guarantee energy delivery in winter months. For new Class I RE resources, bidders were required to guarantee that 70% of energy in their delivery profile of the Winter Peak Period is delivered over the course of every Winter Peak Period (Winter Peak Period is defined as: "the peak winter months of January, February, and December," with the same on-peak hours described above in the Tri-State procurement); for firm service hydro, bidders had to guarantee at least 60% of the highest annual single hourly delivery in every winter peak period hour (as claimed in their annual delivery profile as submitted as a part of their Certification, Project and Pricing Data ("CPPD") Form in their Bidder Response Package).[7]

- **New York Tier 4 procurement**: As part of NY's CES, an RFP to fulfill the CES's 'Tier 4' sought bids to deliver firm clean energy to New York City/NY-ISO Zone J via new transmission. That RFP included requirements for bidders to submit minimum summer and winter season bid quantities, i.e. minimum volumes of energy delivered during specified periods of the year. Summer Minimum Bid Quantity was defined as the minimum

[5] See, for example, the 2023 joint offshore wind RFP released by MA, RI, and CT: RFP for Long-term Contracts for Offshore Wind Energy Projects – August 30, 2023.
[6] Link to RFP website no longer appears active. RFP documents may be available via DPU Docket Search or from DOER.
[7] See 83D RFP Revised June 16, 2017 – Clean.

quantity of Tier 4 RECs that must be delivered during the Summer Capability Period, May through October, as a percentage of bid quantity. In Tier 4, the default minimum was 40% of the annual bid quantity, measured in MWh of energy (technically, RECs). Winter Minimum Bid Quantity was similarly defined as the minimum quantity of Tier 4 RECs that must be delivered during the Winter Capability Period, November through April. The RFP included allowable reductions or shortfalls in summer/winter deliveries for reductions caused by: i) reliability curtailments; ii) force majeure events; and iii) negative LMPs, which triggered another contract provision.[8]

Resource Eligibility and Emissions Stringency

DEP also proposes the option of strengthening eligibility requirements around emissions intensiveness, proposing to increase the emissions benchmark for resources that do not qualify for RPS Class I to a 90% reduction in GHG emissions relative to an existing efficient natural gas-powered facility on a lifecycle basis, consistent with recently proposed EPA standards for natural gas-fired facilities. In general, Acadia Center expresses support for strengthened emissions stringency for this pathway for CES eligibility, and it seems logical to benchmark any updated CES requirements to newly added federal rules such as those from the EPA.

Acadia Center's understanding of the RPS Class I eligibility criteria is that on-site electricity generation from "landfill methane gas" facilities meets the RPS Class I eligibility criteria. Additionally, "eligible biogas fuel," for example produced via anaerobic digestion at facilities including wastewater treatment plants, meets RPS Class I eligibility criteria if the facility in question demonstrates a 50% reduction in life cycle GHG emissions relative to a new combined cycle natural gas electric generating facility. Acadia Center supports RPS Class I eligibility for these two specific biomass generation pathways, because they 1) help to minimize direct, on-site methane emissions from these facilities, 2) provide a source of firm generation to complement variable renewable resources (e.g., wind and solar), and 3) provide a "methane destruction pathway" that, unlike 'renewable natural gas' (RNG), does not rely upon the transportation of methane gas through the leak-prone gas distribution system. Given these RPS eligibility criteria, it seems reasonable that the CES would clearly state that biomass energy pathways deemed ineligible under the RPS Class I requirements (i.e. not achieving a 50% life cycle GHG reduction) are also not eligible for the CES.

Other Recommendations

Acadia Center also provides the following recommendations:

- Regarding comprehensive accounting, we support accounting adjustments to ensure BTM generation is appropriately reflected in calculations of total electricity consumption and adjusted commensurately in retail providers' compliance obligations.
- Regarding the universe of covered electricity suppliers, we support extending the Clean Energy Standard (CES) to apply to Municipal Light Plants (MLP) in addition to existing retail electricity providers, as the depth of statewide emissions reductions targets require an 'everyone do their share' approach to supporting clean energy and decarbonizing the electricity sector (and the full economy).
- Regarding the proposed Just Transition Fee, we are supportive of using any new fees collected to deliver benefits to low-income, environmental justice, and other historically underserved communities. DEP's proposal to support equitable siting of CES eligible projects, such as solar on rooftops in low-income communities, is one promising avenue to get at this objective. However, we expect that the amount of fees collected would be relatively small on an annual basis, meaning that funds available to support these types of projects would be limited in their reach and impact. So, whether in addition to or instead of this fee approach, we recommend DEP consider novel program design elements that would help benefit all underserved communities or as wide a coverage as possible, including broader community shared project

[8] See NYSERDA's 2021 Tier 4 solicitation, available at: https://www.nyserda.ny.gov/All-Programs/Large-Scale-Renewables/Tier-Four/Solicitation-and-Award/RFP-Appendices-and-Schedule

subscription/enrollment opportunities, connectivity with municipal aggregations, linkages with the low-income discount rate program, and beyond.

Conclusion

Acadia Center thanks MassDEP in advance for the consideration of these comments and recommendations on the Clean Energy Standard (CES). We believe this program review offers Massachusetts the opportunity to evolve the CES into an even more meaningful driver of clean energy with a focus on additionality and affordability. We underscore our recommendations above pertaining to the benefits of long-term planning, regional and interregional coordination, and competitive procurements to drive these imperatives of additionality (new clean resources) and affordability (at lower costs) for ratepayers in the Commonwealth.

Please do not hesitate to contact a member of our team if we can be of further assistance as pertains to these comments and DEP's broader work on the CES. Thank you to MassDEP's leadership and staff for the hard work to produce, explore, and refine proposals to advance this important policy framework.

Sincerely,

/s/
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/s/
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