

Department of Energy Resources, the Massachusetts Office of the Attorney General, and Electric Distribution Companies,

On behalf of the Greater Boston Chamber of Commerce, please accept these comments in response to Question # 12 of the 83D Stakeholder Questions regarding the Commonwealth's RFP process for the competitive solicitation of bids to enter into cost-effective long-term contracts for clean energy generation pursuant to Section 83D of Chapter 169 of the Acts of 2008, as amended by Chapter 188 of the Acts of 2016, An Act to Promote Energy Diversity.

The Greater Boston Chamber is a broad-based association representing more than 1,500 businesses of all sizes from virtually every industry and profession in our region, and we work to advocate for public policies that contribute to the economic success of the region and generate economic opportunity for businesses and people.

*12. Section 83D requires the solicitation and consideration of proposals for long-term contracts for a period of 15 to 20 years for clean energy generation. Does 83D allow for the solicitation and consideration of proposals, as one form of bid, in the form of a delivery commitment model approach as contained in the New England Clean Energy RFP (available at:<https://cleanenergyrfpdotcom.files.wordpress.com/2015/11/clean-energy-rfp-final-111215.pdf>). If so, should such proposals be allowed in response to this Section 83D procurement, and do you think the ability to submit such proposals would potentially be utilized by bidders? Would your firm potentially submit such a proposal if allowed as an option?*

We believe it is clear that Section 83D allows for the solicitation and consideration of proposals in the form of a delivery commitment model (DCM) approach as contained in the New England Clean Energy RFP. The DCM approach is consistent with the intent of Chapter 188 of the Acts of 2016 and with the language included within Section 83D, as 83D requires:

- The solicitation and consideration of "cost-effective long-term contracts for clean energy generation," with long-term contract defined as a contract for a period of 15 to 20 years.
- That in developing proposed long-term contracts, the distribution companies shall consider long-term contracts for renewable energy certificates for energy and for a combination of both renewable energy certificates and energy, if applicable.
- That associated transmission costs be incorporated into a proposal.
- That the Department of Public Utilities may authorize or require the relevant parties to seek recovery of such transmission costs of the project through federal transmission rates.
- And that a long-term contract procured under 83D shall utilize an appropriate tracking system to ensure a unit specific accounting of the delivery of clean energy to accurately measure progress in achieving the Commonwealth's goals under Chapter 298 of the Acts of 2008 or Chapter 21N of the General Laws.

Importantly, the legislation also does not require or limit proposals to the form of "power-purchase agreements," therefore DCM should be allowed and included in the RFP process.

The Chamber supports meeting the Green House Gas emission reduction goals set forth in the Global Warming Solutions Act in the most cost-effective way so as to limit the growth of ratepayers' electric bills, and we believe that the DCM approach is a cost-effective option for bidders that will benefit ratepayers in the Commonwealth. We urge you to include the DCM approach in the RFP as an option for bidders to consider.

Thank you for your consideration of these comments. Please do not hesitate to reach out with any questions.

Sincerely,

James E. Rooney

**James E. Rooney**

President & CEO

**Greater Boston Chamber of Commerce**

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