March 1, 2023

FirstLight Power Comments Regarding Massachusetts 83C Round 4 Offshore Wind Solicitation: Request for Public Comment

FirstLight Power (FirstLight) appreciates the opportunity to provide comments in response to the Massachusetts Department of Energy Resources ("DOER") draft Request for Proposals ("RFP") pursuant to Section 83C of Chapter 169 of the Acts of 2008 ("Section 83C"), as amended by the Energy Diversity Act.

FirstLight Power (FirstLight) is a leading clean power producer, developer, and energy storage company serving North America. With a diversified portfolio that includes over 1.6 GW of operating renewable energy and energy storage technologies and a development pipeline with 2,000+ MW of solar, battery, and offshore wind projects, FirstLight specializes in hybrid solutions that pair hydroelectric, pumped-hydro storage, utility-scale solar, large-scale battery, and offshore wind assets. The company's mission is to accelerate the decarbonization of the electric grid by supporting the development, operation, and integration of renewable energy and storage to meet the world's growing clean energy needs and deliver an electric system that is clean, reliable, affordable, and equitable. Based in Burlington, MA, with operating offices in Northfield, MA, and New Milford, CT, FirstLight is a steward of more than 14,000 acres and hundreds of miles of shoreline along some of the most beautiful rivers and lakes in North America.

As a leading clean energy producer with experience operating both large-scale renewable energy and storage assets, as well as distributed solar and battery storage projects here in New England, FirstLight submits these comments to help support Massachusetts's efforts to advance its offshore wind goals in a manner that will maximize decarbonization and cost-effectiveness while maintaining grid reliability and resiliency.

Massachusetts has long led New England's efforts to create an offshore wind industry over the past several years, starting with the establishment of long-term procurement goals and extending to the execution of new offtake contracts, which has been a critical step towards the decarbonization of our electric system. Offshore wind resources are crucially important but are also not sufficient to create an integrated and reliable fully-clean electric grid without support from other renewable resources and energy storage.

The scale of New England's planned volume of offshore wind generation presents a great opportunity for ratepayers to capture additional decarbonization, resiliency, and reliability benefits through the improved utilization of large-scale, flexible energy storage, which can be coordinated with offshore production. Given the fact that the region's collective efforts are largely exposed to similar weather patterns (and therefore likely will face largely synchronous generation profiles), large-scale flexible

storage can ensure this offshore electricity production is provided to New England customers at times when it is needed most—a value that will only be realized if the procurement is properly designed to elicit bids that will deliver this. To reduce (or avoid) reliance on fossil-resources as the provider of needed back-up reliability, an outcome that would set decarbonization progress further behind, Massachusetts should more fully utilize existing renewable energy and storage resources to accelerate the State's path to a net-zero system.

Recent legislation passed in 2022 sought to rectify this issue by prioritizing projects that include a variety of characteristics, including energy storage pairing with both new and/or existing storage resources. We urge the Department to allow for a range of energy storage pairing options to maximize the benefits associated with storage paired with offshore wind and avoid unnecessary limiting factors that would hinder creativity on this issue.

FirstLight recommends that DOER build in a strong incentive for offshore wind generators to operationally pair with energy storage systems, including the deep storage possible at existing pumped storage facilities, which exists at a scale in New England that is well-matched to this solicitation for up to 1,600 MW of offshore wind. Prior procurement structures have technically allowed proposals that pair with an energy storage systems, but limitations in the evaluation structure and inadequate incentives for offshore wind developers to pursue operational pairing with electric storage have failed to lead to such arrangements.

Lastly we believe that DOER should structure the RFP in a manner that avoids counting paired energy storage capacity towards the maximum total capacity of the offshore wind procurement, as this may deter large-scale offshore wind projects from pairing with large-scale storage. Such a limiting factor runs counter to the Commonwealth's stated clean energy goals and may result in substantial missed opportunities to leverage projects paired with large-scale existing storage resources, which offer upwards of 1,800MW of immediately available storage capacity.

Thank you for your consideration of these comments. FirstLight appreciates the opportunity to help Massachusetts advance its clean energy goals.

Sincerely,

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