From:	Western Mass. Rights of Nature
To:	Ferguson, Thomas (ENE)
Cc:	smcrossbrook@hotmail.com
Subject:	83E Round 1 Comments
Date:	Sunday, March 16, 2025 5:50:03 PM
Attachments:	image.png

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Dear Mr. Ferguson,

We are submitting these comments on the forthcoming Request for Proposals ("RFP") for a first-round solicitation for mid-duration energy storage projects under Section 83E ("83E Round 1"). We have two comments:

1. Pump Storage Should Not Qualify. We strongly urge you not to permit pump storage to qualify for 83E Round 1 or any other round of storage procurement. Pump storage, such as the Northfield Pump Storage Facility owned by FirstLight Power, does tremendous damage to river ecosystems. In addition, pump storage always uses more electricity than it generates and is grid tied, therefore pump storage is a net GHG emitter, so not "clean" energy. Finally, allowing pump storage to qualify would interfere with existing markets and result in unnecessary increased energy costs for Massachusetts rate payers.
2. Environmental Justice Issues. Your questions indicate concern that the RFP address environmental justice issues. One very important way to address this is to prohibit pump storage from qualifying for any long-term storage procurements. Indigenous groups have been stakeholders in the relicensing of the Northfield Pump Storage Facility and Turners Dam for over a decade, pleading to increase minimum flows over the Turners Dam to protect traditional cultural properties and raising alarms about the terrible damage both facilities cause to sacred sites and the river ecosystem. Yet these Indigenous voices have been ignored. True environmental justice demands listening to the voices of local Indigenous people and making certain that Northfield does not qualify for any long-term storage contracts.

Sincerely,

Sarah Matthews
Co-founder of Western Mass Rights of Nature

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