From:	Andrew Fisk
To:	Ferguson, Thomas (ENE)
Cc:	Eve Vogel; Sarah Lillie; Kelly Catlett; Mark Zakutansky; bob@americanwhitewater.org; Klein, Rachel (SEN); Freedman, Jared (SEN); Cohen, Elena (SEN); Comerford, Joanne (SEN); Nina Gordon-Kirsch; Andrea Donlon; Kathy Urffer; sarah matthews
Subject:	American Rivers - comments on RFP for 83E - Round 1
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Attachments:	image001.png

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Dr. Ferguson,

Thank you for this opportunity to comment on the forthcoming Request for Proposals ("RFP") for a first-round solicitation for mid-duration energy storage projects under Massachusetts Section 83E ("83E Round 1"). Please accept these comments that are slightly later than the Friday, March 14th comment deadline.

American Rivers works on hydropower policy and relicensings throughout the United States. American Rivers is a founding member of the Hydropower Reform Coalition which includes over 30 members working on public policy at the state and national level. Among the many hydropower relicensings that American Rivers participates in across the country we are active in the proceedings for the operation of Northfield Mountain Pump Storage Project and the interconnected Turners Falls project. Along with other stakeholders we have been tracking the development of Massachusetts renewable energy policy that impacts hydropower. American Rivers is supportive of strong incentives to increase renewable energy that are environmentally beneficial, fiscally sound, and do not conflict with regional markets.

To those ends we are opposed to including existing pumped storage in this first or any future procurement. The current license application for the operation of Northfield Mountain includes an increase in upper reservoir storage as well as operational parameters for the lower reservoir (the Connecticut River) that if implemented will not only continue, but expand the environmental harm this facility causes to the Connecticut River. Our participation in the relicensing of the First Light projects has given us clear understanding of their current profitability and so we see no need for providing additional public subsidy for grid services already provided. Finally while we are supportive of the legislature's work to meet the Commonwealth's climate goals and recognize there is a legitimate and important role for state action, that action should not interfere with the NE-ISO's markets. Those markets currently provide First Light with ample revenue and opportunity to support the regional grid with capacity and reserve services.

By way of this comment, American Rivers is supportive of the more extensive comments provided by Professor Eve Vogel that are responsive to more elements of the RFP than ours above.

Thank you for the opportunity to comment and DOER's thoughtful engagement with this legislative mandate.

Sincerely,

Andrew Fisk, Ph.D.
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Take action for clean water! Use your voice for rivers — and the clean water all of us need and deserve.