March 14, 2025

Thomas Ferguson
Energy Storage Programs Manager
Massachusetts Department of Environmental Resources
100 Cambridge St #1020, Boston, MA 02114

Subject: 83E Round 1 Comments

Dear Mr. Ferguson,

Energy Dome respectfully submits these comments on the MA DOER's 83E Round 1 procurement process. We recognize the thoughtful work that went into drafting these questions, and appreciate the opportunity to work alongside the RFP drafting parties to scope a first-round solicitation for mid-duration energy storage projects under Section 83E. If you have any questions or need clarification or additional information, please do not hesitate to contact the Energy Dome team.

Respectfully submitted,

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Comments of Energy Dome in response to the Department of Energy Resource's 83E Stakeholder Questions

Introduction

The Massachusetts Department of Energy Resources (DOER), the Massachusetts Electric Distribution Companies (EDCs), and the Attorney General's Office (AGO) (collectively "RFP Drafting Parties") seek public comments relevant to a forthcoming Request for Proposals (RFP) for a first-round solicitation for mid-duration energy storage projects under Section 83E (83E Round 1). The RFP Drafting Parties provided areas for comment on specific questions of interest related to 83E Round 1, which is for procurement of environmental attributes only.

Energy Dome is a long-duration energy storage technology company. We respectfully provide comments on related 83E Round 1 and future Section 83E procurements. Recognizing the immense importance of developing a competitive, cost-effective, and impactful and procurement program for long-duration energy storage in Massachusetts, our primary suggestion throughout these comments is to run a robust stakeholder process ahead of future Section 83E procurements. These procurements will be a first of their kind process, and it would be helpful to have diverse perspectives iterate on best practices to steward a successful LDES procurement process in Massachusetts. A stakeholder process would be beneficial to thoroughly a) scope and understand how LDES can best support Massachusetts' energy goals, b) design a procurement process and implementation mechanism(s) that enables all stakeholders to successfully steward an LDES industry in Massachusetts, and c) establish all value streams for LDES that will contribute to Massachusetts' state energy goals. We imagine that this process could conclude with a model RFP, best practices for valuating LDES in Massachusetts, best practices for implementing an LDES program, and an overarching procurement timeline.

Energy Dome Background

Introduction to Energy Dome

Energy Dome is a long-duration energy storage company with a global footprint. We work at the innovation edge to bring our long-duration energy storage technology, the CO2 Battery, to energy systems across the world. We have a simple yet powerful mission in mind: we want to decarbonize the world today, because our world can't wait.

Energy Dome's technology transforms CO2 from its gaseous to liquid state and vice versa. When operating in charge mode, the CO2 is withdrawn from an atmospheric gasholder, the dome, and compressed into an inter-refrigerated compressor driven by a motor. The heat generated from the compression is stored in a thermal energy storage system while the CO2 is liquefied and stored in vessels under pressure at ambient temperature with zero atmospheric emissions. This process allows for high-density energy storage without using cryogenic temperatures. In discharge mode – whenever energy is needed – the CO2 is heated,

evaporated and sent into an expander before flowing back into the dome. In doing so, the expander drives the generator to feed carbon-neutral electricity to the grid.

The CO2 Battery has high round-trip efficiency, meaning it returns 75% of the energy it absorbs during its charge. There's no degradation during its prolonged life (30+ years), and its performance is third-party verified. Furthermore, the system relies on off-the-shelf equipment from established global supply chains, and is able to leverage economies of scale.

The CO2 Battery is being deployed **today** on a commercial scale:

- **Operational Demonstration Plant**: In June 2022, Energy Dome successfully deployed a 2.5-MW – 4 MWh utility-scale demonstration plant, which is currently connected to the Italian grid. The plant's performance has been independently validated by third-party inspectors such as Fichtner and EPRI.
- **First Standard-Frame Facility**: As of February 2025, Energy Dome is finalizing its first standard frame 20 MW – 200 MWh facility in Sardinia, scheduled for completion in early Q2 2025. This facility has already been contracted under an off-take agreement with French Utility Engie.
- **U.S. Markets**: Energy Dome and Alliant Energy are developing a 20 MW – 200 MWh facility at Alliant Energy's Columbia energy center in Wisconsin. The project was selected for a grant of $30 million from the U.S. Department of Energy's Office of Clean Energy Demonstrations and is expected to be approved by the WI PSC in summer 2025.
- **Asia Markets**: Energy Dome is under commercial contract with NTPC, India's largest utility, for a project in Kudgi, with a commercial operation date in mid-2026. Procurement operations for this project have commenced.
- **European Markets**: Energy Dome's CO2 Battery was awarded in Ireland's most recent capacity auction and is set to provide capacity to the Irish grid starting in 2028.
- **Global Deployment Roadmap**: By the end of 2027, approximately 1 GWh of nearly identical projects are expected to be deployed worldwide. ED's robust commercial pipeline currently exceeds 10 GWh across key global storage markets, including:
    - 1 GWh of projects with full environmental approvals secured.
    - 5 GWh of projects in the permitting phase, with secured grid connections, including a flagship 3 GWh green steel project in the Middle East.
    - 4 GWh of projects under active development, with validated use cases.

Key Advantages of the CO2 Battery

The CO2 Battery is a game-changing solution in the energy storage landscape. It brings significant grid benefits:

- **Grid Stability and Ancillary Services**: The CO2 Battery, featuring synchronous motor and generator technology, provides physical inertia and can deliver ancillary services traditionally handled by thermal generation and enhance grid reliability.
- **Capacity and Time Value of Energy**: The CO2 Battery's 8-10+ hour duration, high round-trip efficiency, and flexible charge and discharge schedules make it an essential resource to address electric grid reliability in regions where intermittency is an issue due to high penetrations of renewable resources or in regions experiencing unprecedented load growth.
- **Cost Competitiveness**: The CO2 Battery is an economically viable reliability resource that can be deployed in complement with conventional storage technologies.
- **Secure and Sustainable Supply Chain**: The CO2 Battery does not rely on rare materials susceptible to geopolitical risks. Instead, it is built using widely available, off-the-shelf industrial components.

With an expanding footprint and a strong commitment to innovation and impact, Energy Dome is driving the future of energy storage and supporting a clean, reliable, and affordable energy system.

Comments in Response to 83E Stakeholder Questions

Procurement Schedule

a. The factors the RFP Drafting Parties should consider when designing the schedule for the 83E Round 1 solicitation, including deadlines for bid submission and selection of projects for negotiation. Please include as much specificity in key schedule milestones and timing as well as justification for preferred dates.

Energy Dome recommends that the RFP Drafting Parties consider the following factors as they develop the schedule for the 83E Round 1 solicitation and future solicitations:

- Timeline length: We recommend the total solicitation period be long enough to give stakeholders adequate time to understand the process, project eligibility, and scope but short enough to signal viable development opportunities.
- RFP drafting: We recommend the RFP Drafting Parties schedule in time for stakeholders to provide at least one round of feedback on the RFP and for the Drafting Parties to iterate on the RFP based on stakeholder feedback.
- Bid development: We recommend the RFP Drafting Parties allow adequate time for interested technology companies and work together to form bids that comply with the RFP and so that bids received are competitive and well-scoped.

Based on these factors, Energy Dome recommends the following schedule for the 83E Round 1 schedule.

Event	Timeline	Justification
The RFP drafting parties issue a Draft RFP	Late Q2 2025	RFP issuance is early enough in 2025 for stakeholders to provide feedback and still procure environmental attributes in 2025.
Stakeholders provide public comments on Draft RFP	Through mid Q3 2025	Stakeholders have some time to provide feedback directly on the RFP without significantly delaying procurements.
The RFP drafting parties issue Final RFP	Late Q3 2025	The RFP drafting parties have some time to iterate on the RFP based on stakeholder feedback without significantly delaying procurements.
RFP respondents develop bids (project vetting, partnerships, site control, etc.)	Throughout Q3 and Q4 2025	Respondents have time to develop bids.
RFP Responses due	Late Q4 2025	RFP responses occur in 2025.
The RFP drafting parties evaluate RFP responses	Throughout Q1 2026	The RFP drafting parties have time to review bids and identify projects. Additionally, the RFP drafting parties can use the bids to identify areas that need attention in the stakeholder process.
The RFP drafting parties select projects	Early Q2 2026	

Additionally, for future solicitations in which the objective is to also procure the long-duration and multi-day duration energy storage technologies (collectively, "LDES") pursuant to the targets promulgated in B. 2967, we recommend that the RFP drafting parties host a robust stakeholder process ahead of future Section 83E procurements. Such a process is essential to thoroughly a) scope and understand how LDES can best support Massachusetts' energy goals, b) design a procurement process and implementation mechanism(s) that enables all stakeholders to successfully steward an LDES industry in Massachusetts, and c) establish all value streams for LDES that will contribute to Massachusetts' state energy goals. Relevant stakeholders likely include the Massachusetts Department of Energy Resources ("DOER"); the Massachusetts Electric Distribution Companies ("EDCs"); and the Attorney General's Office ("AGO"); the Department of Public Utilities ("DPU"); the Office of Energy Transformation ("OET"); environmental, energy, business, and community advocates; technology companies; developers; and other entities who will help to effectuate or be impacted by LDES in Massachusetts. We recommend that this process conclude with a model RFP, best practices for valuating LDES in Massachusetts, best practices for implementing an LDES program, and an overarching procurement timeline.

We recommend that the RFP drafting parties launch this stakeholder process as soon as possible and not wait until the conclusion of the 83E Round 1 solicitation.

b. How the 83E schedule could be designed to best align with other energy storage procurements being conducted or planned in neighboring New England states.

Energy Dome does not have a preference about how the schedule may be designed to align with other energy storage procurements in neighboring New England states. Rather, we recommend that the RFP drafting parties align on procurement best practices to enable the successful deployment of LDES in Massachusetts.

Environmental Attributes

a. The environmental attributes in addition to Clean Peak Energy Certificates ("CPECs") that could be procured from your project.

Utilizing Energy Dome's CO2 Battery in Massachusetts would have the following benefits:

- The CO2 Battery operates in a closed loop system, meaning there is no pollution or emissions in operation.
- The CO2 Battery has the ability to charge at flexible time(s) throughout the day, meaning that it can be placed in strategic locations on Massachusetts' grid to reduce curtailments of zero-emissions energy sources.
- The CO2 Battery can be deployed at times of peak demand for electricity, thus mitigating the need for traditionally emissions intensive peaking plants.
- The CO2 Battery can be used to cost effectively enable electrification of gas or fuel-oil heating systems and would contain the need for additional generation sources to meet growing load due to electrification.

Clean Peak Qualification

a. Any barriers to energy storage facilities qualifying for the Clean Peak Standard ("CPS") or other attribute-generating program.

Energy Dome has not participated in the Clean Peak Standard program. However, if the RFP drafting parties intent to use this program to guide future Section 83E procurements, we encourage the RFP drafting parties to consider whether this program, as it exists, specifically signals for LDES resources. If needed, we suggest that the RFP drafting parties use the recommended stakeholder process to modify or add to this program to ensure that it signals specifically for LDES resources and does not place LDES resources in competition with short-duration energy resources.

b. Whether you have been awarded a Clean Peak Program Statement of Qualification ("SoQ") for the project you intend to bid into this solicitation. If not, whether you anticipate having a SoQ prior to bidding your project.

Energy Dome has not applied for a Clean Peak Program Statement of Qualification. However, we intend to develop a viable bid for the 83E Round 1 procurement, in which case we would follow prevailing guidance for obtaining a Clean Peak Program Statement of Qualification.

Eligible Bids

a. Project's technology type (e.g., lithium ion, flow batteries, thermal, etc.), and how it meets the defined Section 83E criteria.

We suggest that the RFP drafting parties not be prescriptive about the type of battery (mechanical, chemical, thermal, etc.) it seeks to procure. This could significantly limit the ability of emerging technologies to have a level playing field with incumbent battery types. Rather, we recommend the RFP drafting parties solicit a diverse group of battery types that can discharge at nameplate capacity for the different durations identified in Section 83E and evaluate bids received based on technology-agnostic eligibility criteria.

b. Appropriate minimum and/or maximum bid size, both in terms of MW and Attributes.

We suggest that the minimum bid size be set at 15 MW and that there be no maximum bid size. A minimum bid size of 15 MW will likely relieve the administrative burden associated with processing a high number of smaller projects that could likely be behind-the-meter. We do not have a suggestion on attributes.

c. Minimum delivery requirements (e.g., a certain number of CPECs delivered that is a function of Qualified Energy Storage Systems ("QESS") capacity); the frequency with which that requirement must be met (e.g., over entire contract, yearly, quarterly); and inclusion of an operational schedule in the bid to support delivery feasibility.

Energy Dome suggests that delivery requirements be addressed through the recommended stakeholder process. It is probable that LDES technologies will have different value stacks than short-duration energy storage systems, so fully understanding the value that Massachusetts hopes to derive of LDES systems and how to quantify that value will be essential for setting requirements in a successful LDES program.

d. Appropriate project maturity requirements.

Given that the set of procurements the RFP drafting parties are contemplating are the first with the explicit goals of procuring LDES technologies, Energy Dome recommends there be relatively achievable and reasonable project maturity requirements to ensure that LDES companies without current projects in

development will have an opportunity to submit conforming bids, thus widening the competition which will ultimately result in optimal outcomes, especially from a cost perspective. For example, the RFP drafting parties could structure the RFP to evaluate a range of projects characteristics that, in aggregate, reduce project risk. These could include factors including, but not limited to, price, counterparty credentials, project development risk, technology maturity, sustainability benefits, system performance characteristics, safety, and siting considerations.

Energy Dome recommends that projects demonstrate a term sheet with some indication of site control, but that projects should not need a queue position.

Facilitating the Financing of Projects

a. **How the requirement from Section 83E—that this solicitation provide a "cost-effective mechanism for facilitating the financing of beneficial, reliable energy storage systems"— could be applied under this RFP. Standards the RFP should set to confirm that projects are using this solicitation to facilitate financing. How those standards could be applied to existing projects to allow their participation in this RFP.**

Energy Dome interprets this requirement as seeking to ensure that the solicitation induces projects that would not have otherwise occurred. This could be challenging to quantify, given that the solicitation is also creating an entirely new storage program in Massachusetts.

We recommend that this requirement be contemplated in the recommended stakeholder process. We recommend that the stakeholder group understand and quantify the full value stack of LDES technologies, assess available financing, and determine mechanism(s) to facilitate additional beneficial financing.

b. **The application of tax credits, for example the Investment Tax Credit and associated guidance, towards the financing of new projects, including whether your project would still be fully financeable if these credits are not available.**

Energy Dome believes that all projects eligible for the Investment Tax Credit and other related clean energy credits should seek these credits to the greatest extent possible. This will result in the most prudently priced projects and will help contain costs for Massachusetts ratepayers. However, if these tax credits are uniformly unavailable, and not just unavailable to our project, there would still be project finance pathways. However, project finance would be more challenging, and projects would be more costly to ratepayers.

c. **The approximate percentage of your capital costs met by: i) CPECs revenue, ii) Energy/Energy Arbitrage, iii) Ancillary Services (Regulation, etc.), iv) Forward Capacity Market.**

Energy Dome does not have an operational commercial project in Massachusetts so cannot comment on this question.

d. The risks associated with each revenue over the life of the project.

The more variable each revenue stream is, the higher the overall project risk is and the higher the cost of capital. Thus, to lower project risk, lower cost of capital, and lower upward pressure on customer rates, Energy Dome recommends the RFP drafting parties try to limit the variability of these revenue streams.

e. Please comment on the following examples of lifetime values pictured below from the Massachusetts Charging Forward report and how they may correspond to your project.

The referenced Figures contemplate a 50 MW, 4-hour lithium-ion storage project and a 5 MW, 4-hour lithium-ion storage project, respectively. Energy Dome's CO2 Battery is an above ground compressed gas 10-hour battery, so cannot compare the costs and benefits to our technology without additional study.

f. How a project's participation in the ISO-NE market affects its bid. Please specifically comment on how any ISO-NE operational obligations will impact the creation of CPECs.

While Energy Dome does not have operational experience in Massachusetts or the ISO-NE market, we envision that having operational obligations in ISO-NE would impact the ability to guarantee the certainty of CPEC creation. Additionally, given the nuances in how long-duration resources can charge and discharge to the grid compared to shorter battery durations, we envision that these impacts will be unique for different duration types. We recommend that this topic be a topic of the proposed stakeholder process to determine best practices for LDES commitment to ISO-NE obligations and/or CPEC creation.

g. How a project and potential awarded contract will contribute to short- and long-term affordability for ratepayers in the Commonwealth.

Energy Dome suggests that the RFP drafting parties create an RFP and program for LDES to result in least-regrets regulatory decisions that are aligned with advancing the state's energy goals. This may involve undertaking a cost benefit analysis of the impact of LDES resources versus traditional thermal resources to understand ratepayer impacts and making procurement decisions based on the result of the analysis.

Commercial Operation Date

a. Any appropriate commercial operation date for Section 83E Round 1.

Energy Dome suggests that the RFP drafting parties set a commercial operation date of 2030 for Section 83E Round 1. Given that there will be multiple rounds of procurements, a 2030 operational date will allow the RFP parties to procure environmental attributes on a meaningful schedule, and signal that there is a

time-bound opportunity for LDES in Massachusetts. We also caution against setting a commercial operation date too far in the future to avoid weakening the signal and momentum for LDES in Massachusetts.

Notably, Energy Dome's CO2 Battery is commercially available today. The CO2 Battery can be developed within 18 months of contract approval, and does not have a long lead time. Further, we prefer to develop on brownfield sites or sites with existing interconnections to avoid delaying our development and operational timelines. Thus, we would be well-positioned to meet a 2030 commercial operation date.

Resource Types

a. **Whether this procurement should allow for both transmission and distribution connected resources.**

Energy Dome does not have a strong preference for whether this procurement should allow for both transmission and distribution connected resources. Notably, Energy Dome's CO2 Battery is a transmission-connected resource. We raise the following considerations for the RFP drafting parties:

- Does having a minimum bid size (e.g., Energy Dome's proposed 15 MW bid size) indicate whether there should be both transmission and distribution connected resources?
- If there are transmission and distribution connected resources, would there need to be two procurements or program designs? Is there incremental administrative burden?
- What are the costs and benefits of having both transmission and distribution connected resources versus having just transmission connected resources?

Contract Length and Form

a. **The contract length, for a period of up to 30 years, that should be considered under Section 83E Round 1 and associated reasoning, including how the contract term will facilitate the financing of the project, how the term aligns with useful life, augmentation schedules, etc.**

Energy Dome recommends that the contract length be flexible based on the duration of the asset. This will support an amortization schedule over the actual useful life of the asset and will facilitate favorable financing terms to help contain costs to customers. Further, we recommend that assets that need augmentation over time have those augmentation schedules and costs specifically included in the contract.

Notably, Energy Dome's CO2 Battery has a 30-year operational life with no degradation over time.

b. Given the degradation of battery performance over time, how contractual provisions for operational security should be constructed to assure optimal/maximum performance for the duration of the contract.

Energy Dome first seeks to clarify that not all long-duration energy storage resources degrade over time. While lithium ion and other chemical batteries may degrade, Energy Dome's CO2 Battery is a closed loop thermal mechanical system with no degradation over time.

In order to level the playing field between those batteries that do and do not degrade, and ensure optimal/maximum performance over time, the RFP drafting parties should include cost and performance data on a degrading curve and should include costs associated with augmentation over the lifetime of the project to maintain optimal/maximum performance.

c. For distribution-connected QESS, how the EDCs would develop manageable contract agreements, including but not limited to defined aggregations with one negotiated contract.

Energy Dome's CO2 Battery is transmission connected; we do not not have a preference on this question.

Safety

a. Which safety standards should be required as a minimum baseline. The safety systems, insurance requirements, relationships with emergency responders and host communities, emergency response plans, and any other necessary protections to keep adjacent communities safe.

We support the RFP parties following prevailing industry standards to ensure maximum safety possible for communities adjacent to or impacted by any storage projects.

Project Viability and Other Qualitative Factors

a. Any risks associated with uncertainty related to tariffs on imports that may impact the supply chain for energy storage systems. Similarly, any risks associated with uncertainty related to the domestic supply chain. What strategies can be implemented to minimize these risks and increase project viability.

Uncertainty related to tariffs on imports is likely to impact various sectors of the economy, including the battery supply chain. Energy Dome is proactively managing our supply chain to facilitate diverse sourcing across regions that are less likely have trade and tariff impacts. Further, Energy Dome's CO2 Battery is sources from off-the-shelf components and has no critical materials, meaning we are well-suited to avoid the negative impacts of tariffs.

b. The key elements that should be considered in evaluating project viability, including any minimum requirements for participating in the RFP. Please specifically comment on i) Site control, ii) Interconnection studies, iii) Technical and logistical viability, iv) Ability to finance the project, v) Bidder experience

All of the referenced elements should be considered when evaluating project viability. We suggest that for early-stage projects – which is likely to be most projects in this procurement given nascent LDES procurement targes – the RFP parties should allow some flexibility. For example:

- Site control: projects may not need to own land yet but should have an agreement for site control in progress.
- Interconnection studies: projects should not need a completed interconnection study as it is unlikely that there are LDES resources currently being procured in Massachusetts that are far enough along to have a completed study.

Energy Dome recommends that the RFP drafting parties reference NYSERDA's Bulk Energy Storage Implementation Plan Proposal in NY DPS's Case 18-E-130. NYSERDA sets forth price and non-price evaluation factors. These include the metrics on cost, project maturity and viability, electricity system value, and societal and economic benefits. NYSERDA also stated that it would consider modified or new criteria in evaluating project maturity and viability and electricity system value for long-duration energy storage resources.

c. Any other considerations that should be considered when drafting the RFP that would impact project viability.

The RFP drafting parties could also assess whether there is a need for non-inverter based resources to replace the grid balancing services typically provided by thermal generating units. Energy Dome's CO2 Battery is a synchronous (non-inverter based) resource which means that it provides rotational inertia in charge and discharge modes. This could be helpful given the NERC Level 2 Alert issued in June 2024.[1]

Economic Development, Workforce, and Diversity, Equity & Inclusion (DEI):

a. How Section 83E Round 1 could be designed to best encourage investments and commitments that maximize economic benefits to the Commonwealth, particularly for transitioning fossil fuel communities, support workforce harmony, and advance DEI goals.

[1] https://www.nerc.com/pa/rrm/bpsa/Alerts%20DL/NERC%20Alert%20Level%202%20-%20Inverter-Based%20Resource%20Model%20Quality%20Deficiencies.pdf

We recommend that the RFP parties include requirements for developers whose bids are selected to conduct community outreach to understand and mitigate community concerns, understand safety risks, and mitigate environmental and health concerns.

Environmental Justice

a. **How Section 83E Round 1 could be designed to best encourage project design and investments that avoid negative impacts on, and direct positive benefits of the project to, Environmental Justice ("EJ") communities.**

Energy Dome has not executed a project in Massachusetts and does not believe that it is the right voice to speak to the needs to EJ communities in Massachusetts. Rather, we suggest that EJ communities be invited as representatives to some or all of the proposed stakeholder process to voice their needs.

Energy Storage Industry

a. **Any trends in or around the energy storage industry that may impact the Section 83E Round 1 procurement and how the RFP Drafting Team should account for them.**

Energy Dome has observed that if long-duration energy storage is not specifically called for in an RFP then it is unlikely to be the storage resource that is ultimately bid in. Thus, if the 83E Round 1 procurement is specifically soliciting storage resources that operate at their maximum/optimal capacity for 8+ hours, we recommend the RFP drafting parties explicitly state that requirement.

Future RFPs

a. **Whether and how the RFP drafting team should consider inclusion of energy services in future 83E RFP Rounds, both in terms of how future RFPs would be similar or different from 83E Round 1's RFP, which is only for environmental attributes. The use of indexing or other adjustment mechanism.**

We recommend that the additional energy services that could be included in future RFP rounds be discussed in the proposed stakeholder process and that best practices for valuating and compensating LDES be an outcome of that process. Energy Dome is committed to being part of the long-duration energy storage industry in Massachusetts and wants to make sure that all of our energy and non-energy benefits are accounted for to secure a reliable, affordable, policy-aligned and safe energy future for Massachusetts ratepayers.

Conclusion

Energy Dome appreciates the opportunity to submit these comments and looks forward to future engagement in this proceeding. We recognize the thought that the RFP drafting parties put into these questions. Please contact Jessie Ciulla Shea for further discussions or questions on this feedback.

Respectfully submitted,

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