From:	Nina Gordon-Kirsch
To:	Ferguson, Thomas (ENE)
Cc:	Eve Vogel; Sarah Lillie; Kelly Catlett; Mark Zakutansky; bob@americanwhitewater.org; Klein, Rachel (SEN); Freedman, Jared (SEN); Andrew Fisk; Cohen, Elena (SEN); Comerford, Joanne (SEN); Andrea Donlon; Kathy Urffer; sarah matthews
Subject:	Connecticut River Conservancy: Comments on 83E - Round 1
Date:	Thursday, March 20, 2025 2:32:39 PM
Attachments:	image001.png

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To Dr. Thomas Ferguson:

Thank you for this opportunity to comment on the forthcoming Request for Proposals for a first round solicitation for mid-duration energy storage projects under Massachusetts Section 83E. I am aware these comments are past due, and I appreciate that you are willing to consider accepting CRC's comments slightly delayed.

Since 1952, CRC has worked to protect and restore the Connecticut River and its tributaries. CRC represents thousands of members across four states, including hundreds in Massachusetts, and as the only nonprofit organization dedicated to protecting the entire Connecticut River ecosystem, our comments consider not only the localized impacts of mid-duration energy storage projects, but also the larger implications they will have in the watershed.

With our mission and work in mind, we are opposed to including existing pumped storage in this or any future procurements. CRC stands with Andy Fisk at American Rivers and with Professor Eve Vogel at UMass Amherst and fully supports the comments they have already submitted to you. I urge you to take Professor Vogel's very thorough and detailed comments into deep consideration and choose to take on her recommendations. She is widely known as an expert in this area and CRC backs her as a reputable source who can help in this stage of your work.

Thank you for this opportunity to comment.

Best,
Nina Gordon-Kirsch
Massachusetts River Steward
CRC

From: Andrew Fisk <afisk@americanrivers.org>
Sent: Monday, March 17, 2025 7:45 AM
To: Thomas.Ferguson@mass.gov <Thomas.Ferguson@mass.gov>
Cc: Eve Vogel <evev@umass.edu>; Sarah Lillie <slillie@americanrivers.org>; Kelly Catlett <kcatlett@americanrivers.org>; Mark Zakutansky <mzakutansky@outdoors.org>; bob@americanwhitewater.org <bob@americanwhitewater.org>; Klein, Rachel (SEN) <Rachel.Klein@masenate.gov>; Freedman, Jared (SEN) <jared.freedman@masenate.gov>; Cohen, Elena (SEN) <Elena.Cohen@masenate.gov>; Comerford, Joanne (SEN) <Jo.Comerford@masenate.gov>; Nina Gordon-Kirsch <ngordonkirsch@ctriver.org>; Andrea Donlon <adonlon@frcog.org>; Kathy Urffer <kurffer@ctriver.org>; sarah matthews <smcrossbrook@hotmail.com>
Subject: American Rivers - comments on RFP for 83E - Round 1

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.
Northeast Regional Director
413-407-6484
AmericanRivers.org
Instagram | Facebook | Twitter

Take action for clean water! Use your voice for rivers — and the clean water all of us need and deserve.