



Great River Hydro

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83E Round 2 RFP Drafting Parties
c/o Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 900
Boston, MA 02114

VIA EMAIL: Thomas.Ferguson@mass.gov

RE: Section 83E Round 2 – Distribution-Connected ESS Procurement Process Comments

Dear Commissioner Mahony, Mr. Ferguson, and RFP Drafting Parties:

Great River Hydro, LLC (“Great River Hydro” or “GRH”) appreciates the opportunity to respond to the RFP Drafting Parties’ request for stakeholder feedback in their July 31, 2025 announcement regarding the coming Distribution-Connected ESS Section 83E procurement.

Great River Hydro owns and operates thirteen conventional hydroelectric generating facilities located on the Connecticut and Deerfield Rivers in Massachusetts, Vermont and New Hampshire. At a nominal rating of 589 megawatts (MW), our portfolio of forty-five generating units at 13 generating stations produces approximately 1.6 terawatt hours (TWhs) of carbon-free generation annually. These facilities, like other incumbent generators, have access to existing interconnection and area to co-locate energy storage systems that make the sites ideal for such development. Furthermore, Massachusetts’ Clean Peak rules further incentivize co-location with existing renewable generators such as Great River Hydro’s assets here in the Commonwealth.

In fact, GRH is currently in the process of developing a 7 MW, 28 MWh battery energy storage system alongside its Deerfield #3 hydroelectric facility in Buckland, Massachusetts. Certified as a Low Impact Hydropower facility¹, Deerfield #3 has been generating power for over a century. The battery project would leverage the hydro plant’s existing interconnection at National Grid’s 69 kilovolt (kV) sub-transmission system that serves the local distribution system, and the hydro-BESS hybrid project would optimize output to deliver on the objectives of the Clean Peak Program. Notably, the project has an approved interconnection, which is the most difficult hurdle in the development process (the interconnection process began in July 2021). It is aiming for commercial operation on March 19, 2027. The project is anticipated to generate 30,000 Clean Peak Certificates per year between the BESS and existing hydro project combined. We believe this project is exactly what the Commonwealth has been seeking to incent both with its procurements as well as with its Clean Peak program.

¹ Low Impact Hydropower Institute – Certificate #90

Unfortunately, the project did not meet the Section 83E Round I criteria for transmission-interconnected projects because it was under the 40 MW minimum. Now, under the proposed Round II solicitation, this project could also be excluded from participation because it will be interconnected at 69kV. The proposed Section 83E II eligibility criteria could result in a procurement process that leaves our project out, and likely other similar projects. Accordingly, for the purposes of this solicitation, GRH urges that distribution-connected projects be defined as those interconnecting at 69kV or lower voltage.

Furthermore, GRH believes there is no sound reason for putting a threshold size on energy storage projects under any 83E solicitation, whether distribution or transmission interconnected. Site constraints, burdensome permitting processes, interconnection limitations, and project economics already place tremendous pressures on bringing these important resources to market. GRH strongly believes that the competitive market can and will find the most efficient and affordable way to help the Commonwealth to meet its decarbonization requirements over the coming years. And Massachusetts will need to count every resource it can to get there. We understand that contracting numerous small projects is administratively difficult, and therefore some minimum size may be necessary (we suggest 4.5 MW due to the interconnection rules around projects less than 5 MW). We urge you to maximize the competitiveness of the Section 83E procurements by ensuring that projects like GRH's are eligible to compete.

Thank you for the opportunity to comment on the RFP process for 83E Round 2 procurements.

Sincerely,



Brandon Kibbe
Vice President, External Affairs