



August 28, 2025

Via electronic filing: Thomas.Ferguson@mass.gov

RE: 83E Round 2 Distribution-Connected Energy Storage Comments - Redacted

Mr. Thomas Ferguson
Energy Storage Programs Manager
Massachusetts Department of Energy Resources
100 Cambridge Street, 9th Floor
Boston, MA, 02114

Dear Mr. Ferguson,

Nexamp appreciates the opportunity to provide supplemental comments to the comment letter submitted by the Storage Partners on the draft guidance for distribution-connected energy storage eligibility for the second round of the Section 83E solicitations. These supplemental comments provide confidential information on Nexamp's distribution storage pipeline in response to MA DOER's question on projects in development which have been redacted for this version of the comments.

As the largest developer, owner, and operator of community solar assets in the U.S., Nexamp has been at the forefront of efforts to make clean energy affordable and accessible for all Americans. Many of our community solar projects include energy storage. We are also developing a significant standalone energy storage pipeline across various jurisdictions. By managing all aspects of a project's lifecycle in-house—from development, engineering, and construction through operations and customer management—Nexamp brings rapid renewable energy deployment and high-quality jobs to the communities we serve. In 2015, Nexamp launched the first open-to-all community solar program that eliminates credit checks, up-front fees, and long-term commitments to help customers save up to 20% on annual electricity costs.

We strongly support the Commonwealth's leadership in advancing decarbonization and energy reliability, and we appreciate the clear signal from MA DOER on including distribution-connected resources in the next round of the Section 83E Mid-Duration Energy Storage procurement.

We encourage MA DOER to provide guidance on the timing of the second and third rounds of procurement. Currently, uncertainty around market opportunities and tariffs for distribution-connected storage in Massachusetts has stalled development. While project development inherently carries risk, greater clarity on state programs and support for distribution-connected resources would help reignite stalled projects and accelerate progress toward the Commonwealth's clean energy goals.

Projects Under Development:

- Please provide information about your pipeline of distribution-connected Mid-Duration Energy Storage Systems, including but not limited to the following information:
 - Total number of projects under development: **REDACTED**
 - Capacity range (lowest MW – highest MW): **REDACTED**

- Total portfolio capacity (MW and MWh): **REDACTED**
- Proportion of projects that are located front-of-the-meter (FTM) versus behind-the-meter (BTM): **90% FTM, 10% BTM**
- Proportion of projects that are standalone versus co-located: **70% standalone battery projects, 30% co-located battery projects**
 - For co-located, proportion that plan to participate in SMART: **All such projects plan to participate in SMART**
- Proportion of development in three EDC territories: **70% National Grid, 30% Eversource, 0% Unitil**
- Proportion of development in ISO-NE subareas: **N/A**
- Range of expected Commercial Operation Dates: **September 2026 to December 2031**

Additionally, the design of the first-round procurement and the proposed expansion of resource eligibility for the second round still leaves a gap for transmission-connected resources under 40 MW. We encourage MA DOER to expand transmission-level eligibility to projects 19 MW and above.

Allowing smaller transmission-connected projects broadens access to distributed resources and provides greater flexibility in interconnection. For example, it enables larger projects to deliver peak power to smaller 69 kV substations. It also supports higher project density in specific areas, enhancing local reliability and community benefits.

Thank you for the opportunity to provide comment. Please do not hesitate to reach out if there are any questions.

Thank you,

Lisa Boba
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