Evaluation Team Response to Section 83E Bidder Questions:

Question 1: In the DRAFT RFP that on top of page 11, it states: "This solicitation allows bidders to offer proposals of Energy Storage Systems connected to the transmission system, as defined as above 69 kilovolts (kV) and sized between 40MW and up to 1,000 MW." We would like clarification whether a bid would meet the requirement on this specific point of transmission voltage if the transmission access was **at 69 kilovolts**

Response 1: As clarified in the final RFP that was issued on July 31, section 2.2.1.1 now states: "This solicitation allows bidders to offer proposals of Energy Storage Systems connected to the transmission system, **as defined as 69 kilovolts (kV) and above,** and sized from 40 MW up to 1,000 MW."

Question 2: The RFP addresses the need for bidders to have submitted an interconnection request in 2.2.1.7. Given that ISO-NE is not considering any new Interconnection Requests until late 2026 as part of the first Cluster Request Window (with a subsequent study phase that will likely run through mid/late 2027), will projects without an active Interconnection Request be considered for this RFP? Is there an anticipated timeline for future RFP rounds?

Response 2: More information on Round 2 RFP requirements will be provided at a later date. Section 83E requires the Round 2 solicitation by July 31, 2026.

Question 3: Do different capacities of the same standalone storage project count as "variants" and therefore require separate bid fees?

Response 3: Yes

Question 4: In order to submit audited financials as part of a response, we will need to execute an NDA with the MA DOER. Would MA DOER be willing to sign an NDA? If so, do you have a form you would prefer to use, or should we send you Longroad's?

Response 4: Pursuant to Section 1.7.4 and Appendix E of the Section 83E RFP, Bidders must clearly identify all confidential or proprietary information in their submissions. The Evaluation Team, including DOER, will use commercially reasonable efforts to treat any confidential information received from Bidders in a confidential manner and will not use such information for any purpose other than in connection with the Section 83E RFP. DOER will also protect confidential information submitted as part of the Section 83E procurement under G.L.c. 25A, § 7, which provides DOER the statutory authority to protect price, inventory and product delivery data. If any confidential information is sought in a regulatory or judicial inquiry or proceeding or pursuant to a request for information by a public utilities commission the Evaluation Team will take reasonable steps to limit disclosure and use of confidential information through the use of non-disclosure

agreements or requests for orders seeking protective treatment, and shall inform the Bidders that the confidential information is being sought.

Question 5: Section 2.2.1.5 outlines the contract term. The section says that Bidders can offer the project for up to 20 years or until 12/31/2050, but also says that Long-Term Contracts can be up to 30 years. Can you help me understand the difference between the 20-year limit and a potential 30-year contract?

Response 5: While Section 83E specifies that "approximately 1,500 megawatts of mid-duration storage shall be procured by July 31, 2025, and shall be for environmental attributes only;" the currently known environmental attributes specifically applicable to energy storage systems in the Commonwealth of Massachusetts that have value are "Clean Peak Energy Certificates," or "CPECs." As referenced in RFP § 2.2.1.5, Contract Term, the Clean Peak Program is discontinued on December 31, 2050, as stated in St. 2018, c. 227, §§ 14, 25. As the RFP § 2.2.1.2, "Eligible Bids" requires a Commercial Operation Date before January 1, 2030, this leaves at least a 20-year window of known and quantifiable "environmental attribute" values available for procurement. As the Section 83E statute does not specify procurements for "environmental attributes only" in future procurement rounds, subsequent procurements under the statute may result in contracts for additional products, such as energy, ancillary, and regulation services, which are anticipated to retain value beyond 2050.

Question 6: Is a 500MWh project capable of discharging 250MW per hour, but also capable of discharging 125MW across four hours eligible to offer the facility as a 125MW, four-hour resource? By way of example, consider a 500MWh battery that can discharge at 125MW. That battery would qualify as a Mid-Duration Energy Storage System offering 125MW into the program, assuming all other criteria are met, correct? Now consider if that same 500MWh battery is capable of discharging at 250MW or 125MW, it would still be eligible to offer 125MW into the program, correct? The battery can operate identically to a 125MW by 500MWh battery in the example above, but also has higher power flexibility.

Response 6: Section 96 of Chapter 239 of the Acts of 2024 amended Section 83B of Chapter 169 of the Acts of 2008 to include the definition for Mid-duration energy storage system. It defined "Mid-duration energy storage system" as energy storage system that is capable of dispatching energy at its full rated capacity for a period equal to or greater than 4 hours and up to 10 hours. Any project that is not capable of dispatching at its full rated capacity for 4 to 10 hours would not be eligible for this solicitation. Therefore, a 500 MWh project must have a nameplate capacity of at most 125 MW. A 500 MWh project capable of discharging at 250 MW does not meet the definition of Mid-duration energy storage system.

The definition of "nameplate capacity" the Evaluation Team is applying is given in response to the next question.

Question 7: What definition of Nameplate Capacity will the DOER and the Evaluation Teams apply? There is no definition of Nameplate Capacity in the RFP or the statute.

> **"Mid-duration Energy Storage System"** means an energy storage system, as defined in section 1 of chapter 164 of the General Laws, that is capable of dispatching energy at its Full Rated Capacity for a period equal to or greater than 4 hours and up to 10 hours.
>
> "**Full Rated Capacity**" means the actual Nameplate Capacity of the Facility, as built, and as certified by an Independent Engineer.
>
> **"Nameplate Capacity"**– undefined in the RFP or statute
>
> **"Facility"** – undefined in the RFP or statute

We note the specific interpretation of the statute provided by State Rep. Roy to the DPU, that expresses the legislature's intent that facilities like the second example in question 1, above, would qualify consistent with the nameplate capacity capable of discharging over the statutory period. Will the definition of Nameplate Capacity that the DOER and the Evaluation Teams apply be consistent with the legislative intent?

Response 7: "Nameplate capacity" is a widely used term in the energy industry for both generation assets and energy storage systems to represent the maximum rated output from the facility as designated by the facility manufacturer. This aligns with the definition of "generator nameplate capacity" used by the U.S. Energy Information Administration (EIA), which the EIA applies to both generation assets and energy storage systems.

> **"Generator nameplate capacity (installed):** The maximum rated output of a generator, prime mover, or other electric power production equipment under specific conditions designated by the manufacturer. Installed generator nameplate capacity is commonly expressed in megawatts (MW) and is usually indicated on a nameplate physically attached to the generator."

Participants in this RFP must be able to dispatch energy at their maximum rated output (dispatch rate), as certified by an Independent Engineer, for a period of at least 4 hours and no more than 10 hours.

Question 8: Are BTM storage projects eligible for this solicitation if the load customer is connected to transmission system and meets all other eligibility requirements (e.g. size, duration)?

Response 8: As described in Section 2.2.1.1 of the 83E Round 1 RFP, Energy Storage Systems must be connected to the transmission system, as defined as 69 kV and above, be sized from 40 MW up to 1,000 MW, and comply with all requirements set forth in the Clean Peak Energy Portfolio Standard regulations.

Question 9: The Bidder views the question 8.7 of the RFP, a request to provide letters of support from first responders, of which fire officials could be included, as potentially problematic from the perspective of fire officials as they could have a conflict of interest. In the project development cycle, the primary job of a fire official is to determine whether to grant a permit or not to the project, and issuing a letter of support for a certain project, when they will later be asked to officially evaluate a permit request for the project, could be considered akin to seeking support letters from the EFSB that will later decide our case. Does the Evaluation Team have any further guidance regarding this issue on RFP question 8.7?

Response 9: Letters of support from fire officials are not required under the RFP. While not required, the RFP encourages bidders to provide testimonials or statements demonstrating that they have conducted stakeholder outreach and communication with regard to their safety plan.

Question 10: Could the Evaluation Team provide the best definition of "Energy Storage System Developer" so that the Bidder can answer the question asked in the CPPD form Part III- How the developer of this proposal meets the definition of "Energy Storage System Developer"?

Response 10: Please provide information on how the Bidder will be the developer of the Proposed Energy Storage System and will have the right to convey the environmental attributes to the Electric Distribution Companies.

Question 11: Could the Evaluation Team elaborate and provide examples of the documentation required to respond to question 4.1, requesting documentation and information demonstrating that the project will deliver into the EDCs NEPOOL GIS accounts? The Bidder is unclear what documentation would demonstrate future delivery into the EDCs NEPOOL GIS accounts for a project proposal representing a development stage asset which has not yet begun the registration process with NEPOOL and the State of Massachusetts for the Clean Peak Energy Standard.

Response 11: Please provide information on your plans to open a NEPOOL GIS account. More information can be found here: https://nepoolgis.zendesk.com/hc/en-us/articles/360009496593-Account-Registration-Process-Overview

Question 12: For projects that are partially eligible for the Clean Peak Standard, should responses provided in Appendix A and the CPPD form (Part IV and Part IV, for example)

reflect information associated with the entire facility or only the bid portion eligible to generate CPECs? For example, when answering charge or discharge rate, storage energy (MWh) or providing a representational operation profile, should the information include full facility capabilities or only the bid capacity?

Response 12: The responses in Appendix A and the CPPD form should reflect the information associated with the portion of the project that comprises the capacity of the bid being offered into the procurement.

Question 13: Please confirm our understanding that the bid fee is based on the capacity offered into the RFP, rather than the project's total buildout capacity. For example, our facility is being developed for 100 MW, but we intend to offer 50 MW into this solicitation. Under our interpretation, the bid fee would be $25,000 (50 MW × $500/MW).

Response 13: The bid fees apply to the capacity the bidder offers in response to the RFP, not the total buildout capacity should the bidder offer less than the total buildout capacity.

Question 14: Eligibility of Connecticut-Based Projects – Our project is being developed in Connecticut and will be grid-connected to the ISO-NE system. It is our interpretation that such a project is eligible to participate in this RFP. Please confirm that a Connecticut-based, ISO-NE transmission-connected BESS project is eligible to submit a bid into this solicitation.

Response 14: Round 1 of 83E is for environmental attributes only and the only environmental attributes produced by energy storage that have value in Massachusetts are Clean Peak Energy Certificates (CPECs), resulting from eligible operation in the Clean Peak Energy Standard (CPS). One eligibility criterion for transmission-connected energy storage systems in CPS is that they "shall be interconnected with the Transmission System in the Commonwealth of Massachusetts." Thus a transmission-connected project located in Connecticut must be able to demonstrate that it is interconnected with the transmission system in the Commonwealth of Massachusetts.

Question 15: If a project is in Connecticut (or elsewhere in ISO-NE) and can demonstrate reliable delivery into Massachusetts load zones, will such a project be evaluated on an equal basis with Massachusetts-sited projects? Or, alternatively, does the RFP scoring framework provide a preference or weighting for projects physically located within the Commonwealth?

Response 15: A transmission-connected energy storage system located in Connecticut that can demonstrate it is eligible for the Clean Peak Energy Standard (CPS) (please see the previous response and the CPS Regulation) will be evaluated against the Quantitative and

Qualitative criteria described in Sections 2.4 through 2.6 of the 83E Round 1 RFP, which evaluate costs and benefits of bids to the Commonwealth of Massachusetts and its ratepayers.

Question 16: We are a non lithium energy storage system. We provide a variety of solutions from kwh packs to 40ft containers of 10mw as a one-time purchase. We don't offer CPEC. We usually have the customer work with a 3rd party vendor to address that issue. Will this be an issue?

Response 16: Round 1 of 83E is for environmental attributes only and the only environmental attributes produced by energy storage that have value in Massachusetts are Clean Peak Energy Certificates (CPECs), resulting from eligible operation in the Clean Peak Energy Standard (CPS).

Question 17: Does the Proposal Validity requirement in section 1.7.2 of the RFP also require exclusivity (i.e. that the project cannot market products to other prospective buyers until October 2026), or just that proposal terms submitted by the Bidder shall not be modified? –

Response 17: Section 1.7.2 requires that the Environmental Attributes offered to the EDCs are not offered to other buyers while the Bid remains valid.

Question 18: The CPPD Form includes a question on Buyer's Percentage Entitlement of facility output on a percentage basis. Are projects permitted to offer less than 100% of their output? If less than 100% is offered, does the Right of First Refusal for excess generation included in the long-form contract also cover the quantity that was not initially bid?

Response 18: The Right of First Refusal for excess Environmental Attributes only applies to the percent of the project offered in the bid.

Question 19: In Section 2.5 of the RFP, it is stated that the quantitative evaluation metric will be real levelized dollars per clean peak energy certificate ($/CPEC), using a discount factor of 7.14%. Are values discounted back to the Evaluation Date, or to the Commercial Operation Date of the project?

Response 19: The Evaluation Team will determine a method that compares all bids fairly.

Question 20: When calculating levelized real dollars per CPEC, is the quantity of CPECs in each year in the denominator also discounted at 7.14%? For context, understanding this provision better would allow bidders to select the contract term length that delivers the highest value.

Response 20: The Evaluation Team will determine a method that compares all bids fairly.

Question 21: Projects in the ISO-NE Transitional Cluster Study would be required to execute a Transitional Cluster Study Agreement with ISO-New England, including substantial commercial readiness security deposits, on October 10th, 2025, as posted on ISO-NE's website. This date is after the RFP submission date (September 10th) but prior to the target award date (December 2025). Will the Evaluation Team be asking projects for evidence that the TCS Agreement has been signed prior to an RFP award?

Response 21: Projects must demonstrate a valid interconnection request at the time of Bid Submission but not at the time of selection. However, the Evaluation Team will prefer projects that demonstrate low risk, including risk to Commercial Operation Date and risk to project Viability. Bidders should inform the Evaluation Team of any interconnection status update during the Bid Evalution time period.

Question 22: Section 2.2.1.2 of the RFP states that all projects must provide for a planned commercial operation date before January 1, 2030. Is this planned date required to match the Guaranteed Commercial Operations Date in the Attribute Purchase Agreement?

Response 22: The milestone COD in the purchase agreement can be any date before January 1, 2030, if the developer expects the facility to reach COD prior to the planned commercial operation date of January 1, 2030. However, the COD may not extend beyond January 1, 2030.

Question 23: For the $40,000 per MW Development Period Security, is the undrawn amount fully released once COD occurs and the Operating Period Security is posted, or can any portion be held longer?

Response 23: The EDCs will release Development Period Security following the completion of the associated milestones and receipt of the Operating Period Security, including any additional security that may have been posted for milestone extensions.

Question 24: For a single project signing two different distribution company contracts, does the seller need to post separate LC's equal to $40,000 per MW (at both DPS and OPS) for each, or will a single $40,000 per MW LC be sufficient for both contracts?

Response 24: A single $40,000 per MW security amount will be pro-rated to all EDCs based on their load share. Each EDC counterparty will require a separate Letter of Credit.

Question 25: In Section A-7, for 7.6, what is meant by "interconnection facilities control?" Does this refer to site control over land for the POI, substation upgrades, or other offsite facilities?

Response 25: Interconnection site control refers to all of the necessary land rights and documentation required to develop, construct, and operate the proposed project, including all upgrades and offsite facilities.