



Salt Cod Storage

Massachusetts Department of Energy Resources
2025 Request for Proposals for Long-Term Contracts for Energy Storage Projects



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Section 83E Request for Proposal Application Form

Applicant Information	
Applicant	Salt Cod Energy Storage
Contact	Juliana Mandell
Address	100 Summer St., 16 th Floor, Boston, MA 02110
Phone	[REDACTED]
Email	[REDACTED]

Section A-1: Certification, Project, and Pricing Data

The Certification, Project and Pricing Data (“CPPD”) document is provided as an attachment to this RFP response, please see attachment Salt Cod_MA83E_A1_CPPD.

Section A-2: Executive Summary of the Proposal

The bidder is required to provide an executive summary of the project proposal that includes a complete description of the proposed Energy Storage System bid, the proposed contract term and pricing schedule, interconnection plan, the overall project schedule and other factors the bidder deems to be important. A table summarizing proposal(s) including details such as storage project location, interconnection location(s), capacity (MW), duration (hours), projected annual average CPECs or Environmental Attributes, energy storage technology to be deployed, commercial operation date, pricing (\$/CPEC or environmental attribute), etc. is encouraged.

Salt Cod Storage (“Salt Cod”) is a proposed containerized [REDACTED], 4-hour duration battery energy storage system (“BESS”) located in [REDACTED]. Please see the table below for the proposal summary.

Proposal Summary	
Storage Project Location	[REDACTED]
Interconnection Location	[REDACTED]
Capacity (MW)	[REDACTED]
Duration (hours)	4 hours
Projected Annual Average CPECs	[REDACTED]
Energy Storage Technology	Lithium-ion battery energy storage
Commercial Operation Date	12/31/2028
Pricing (\$/CPEC)	[REDACTED]

[REDACTED]

Salt Cod is situated to absorb excess production during times of oversupply and dispatch stored energy during times of undersupply, helping not only reduce curtailment of clean energy but better utilize the transmission system in the Commonwealth. By optimally using both the transmission system and proposed clean energy resources, Salt Cod will reduce overall system and ratepayer costs.

The Flatiron leadership team brings decades of experience to the development, construction, finance, and operation of Salt Cod.

[REDACTED]

Flatiron Energy is an independent power producer (IPP) exclusively focused on utility-scale standalone energy storage and led by a highly experienced team.

[REDACTED]

Flatiron is a portfolio company of Hull Street Energy, a well-capitalized, woman-led private equity firm.

Flatiron is eager to leverage the expertise of the team, proven track record and financial strength to successfully deliver Salt Cod. Thank you for your consideration.

Section A-3: Operational Parameters and Operational Schedule

3.1 Energy Storage System Operations Project Summary – Please provide the following:

Project Summary	
Identify if New or Existing Facility, or an upgrade to Existing Facility	New Facility
Technology Type (e.g., mechanical, chemical, thermal)	Electrochemical battery energy storage
Technology Description (e.g., battery chemistry, thermal storage medium)	[REDACTED]
Point of Interconnection Deliverability Restrictions (if any)	[REDACTED]
Nameplate MW AC (at 100% project completion)	[REDACTED]
Net Contract MW AC (at 100% project completion)	[REDACTED]
Charge rate (MW)	[REDACTED]
Discharge rate (MW)	[REDACTED]
Storage Energy (MWh)	[REDACTED]
Discharge Duration at Full-Rated Capacity (hours)	4 hours
Round Trip Efficiency (%)	[REDACTED]
Other Characteristics of your system, including, if applicable, but not limited to: Depth of Discharge (%), Full Duty Cycle, etc.	[REDACTED]
Max/ Min cycles per year	[REDACTED]
Max/ Min cycles per season	[REDACTED]
Max/ Min cycles per day	[REDACTED]

3.2 Describe the operation of the proposed Energy Storage System: (i.e., run hour limitations, ramp rates, spinning reserves, regulation up, regulation down). Please provide proposed operational management terms that memorialize the operational commitments of the facility.

Salt Cod is an energy storage system (ESS) designed to maximize operational flexibility and benefit both the local and regional transmission system. The project can provide a blend of different products including Energy, Capacity, Regulation Up, Regulation Down, Voltage Support, Spinning & Non-Spinning Reserves, and Frequency Response.

[REDACTED]

The system will be bid into the DA and RT markets to co-optimize maximal CPEC production while providing the option of additional power and ancillaries to the ISO-NE market.

The ESS is designed for a 4-hour [REDACTED].

3.3 Describe the location of the Energy Storage System, the anticipated interconnection point, and the value of the relative proximity of the system to any clean energy generation facility, including any decreased risk of curtailment and/or deferred investment for the generation facility. If applicable, describe how the location of the Energy Storage System may impact the operation of fossil-fuel based generators.

[REDACTED]

3.4 Describe the proposed technology and equipment manufacturer by name and model (include inverter characteristics if applicable).

[REDACTED]

3.5 Describe the viability and operational reliability of the proposed technology and track record of the manufacturer. Provide examples of similar applications of the same size and scope.

The Salt Cod Storage project has identified Tier 1 partners that offer best-in-class quality and performance for the major components of the project. The selection process was based on safety – both inherent to the product

and at an integrated system level – as well as track record for delivering quality products on time, domestic production and/or service capabilities, and optimizing the overall system design.

[REDACTED]

3.6 Please provide an Environmental Attribute delivery plan and a charge/discharge profile for the proposed project, including supporting documentation. This documentation may be either an hourly storage use schedule or planned charge and discharge schedule. In your plan please account for forecasted weather data and market assumptions over the life of the proposed contract. The energy production/delivery profile must provide the expected Generation to be delivered into the ISO-NE market settlement system by the Energy Storage System to allow the Evaluation Team to determine the reasonableness of your projections. Such information should be consistent with the charge/discharge profile provided above and also considering any and all constraints to physical delivery into ISO-NE. Describe the operation of the Energy Storage System, including whether the proposed Energy Storage System will be classified as a Binary Storage Facility or Continuous Storage Facility, the designation of the ISO-NE Markets that the Energy Storage System would participate in, and the plan to operate in multiple ISO-NE Markets.

The Project would generate Environmental Attributes (CPECs) by following the hourly charge/discharge profile set forth below.

[REDACTED]

The Project will be classified as a Continuous Storage Facility with ISO-NE. The Project would participate in the Forward Capacity Market, Real-Time and Day-Ahead Energy Markets, Ancillary Services markets, and other ISO-NE markets that may be or may become available to Energy Storage Facilities throughout the term.

[REDACTED]

3.7 Please describe how, as a Qualified Energy Storage System as defined in 225 CMR 21.00 Clean Peak Energy Standard (CPS), the storage system will meet the CPS requirements to operate primarily to store and discharge renewable energy. Specifically, please describe any co- location or contractual pairing with an RPS qualified resource, describe/include plans for charging coincident with periods of typically high renewable energy production, or include an operational schedule in the Qualified Energy Storage System's Interconnection Service Agreement demonstrating that the Qualified Energy Storage System serves to resolve load flow or power quality concerns otherwise associated with intermittent renewable energy resources.

The Project would meet the definition of Qualified Energy Storage System as defined in 225 CMR 21.00 by adhering to the requirements of 225 CMR 21.05 (2)(c) to charge during periods of typically high renewable energy production. Please see the hourly profile and description included as Bidder's response to question 3.6.

3.8 Please list and describe all anticipated revenue streams associated with the Energy Storage System, including, but not limited to, the designation of the ISO-NE Markets that the Energy Storage System would participate in, the plan to operate in multiple ISO-NE Markets, and revenue streams from other third-party contracts/arrangements. For existing facilities, describe existing operations, revenues, and participation in ISO-NE Markets and describe any planned changes in operation, participation in ISO-NE Markets, and revenue streams.

The Project would participate in the Forward Capacity Market, Real-Time and Day-Ahead Energy Markets, Ancillary Services markets, and other ISO-NE markets that may be or may become available to Energy Storage Facilities throughout the term.

[REDACTED]

3.9 Maintenance Outage Requirements – Specify partial and complete planned outage requirements in weeks or days for all generation facilities and associated facilities required for the delivery of energy from the generation facilities to the delivery point. Also, list the number of months required for the cycle to repeat (e.g., list time interval of minor and major overhauls, and the duration of overhauls).

Please see response in Sections 12.1-12.3 for proposed Operations and Maintenance plans for the Project. Planned and unplanned outages may be necessary for routine equipment maintenance, and for capacity augmentation as described in Section 3.11.

[REDACTED]

3.10 Operating Constraints – Specify all the expected operating constraints and operational restrictions for the project (e.g., limits on the number of hours a unit may be operated per year or unit of time or charge / discharge cycles per year).

Please see response in Sections 3.1 and 3.2. for summary of operating parameters, as well as the datasheets for the proposed equipment included as attachments:

[REDACTED]

3.11 Degradation mitigation plan – If applicable to the proposal’s technology type, specify the anticipated degradation rate (absent any mitigation) and plan for mitigation of output degradation (e.g., augmentation schedules or over build plans).

[REDACTED]

Section A-4: Environmental Attribute Delivery Plan

4.1 Please provide documentation and information demonstrating that the project will deliver into the EDCs NEPOOL GIS accounts, GIS Certificates representing CPECs and any other Environmental Attributes, as applicable associated with the energy storage project. Please describe whether transfer of all GIS Certificates is authorized under the current ISO-NE GIS rules and protocols, or if a rule or protocol change is required. To the extent such change is required, please provide details regarding the proposal and the process for implementing the change.

Yes, the Bidder will deliver CPECs to the EDCs NEPOOL GIS accounts to convey the Environmental Attributes associated with the Project as described herein and consistent with Section 4.5 of the Storage Environmental Attribute Purchase Agreement.

The Bidder, or its contracted designee, will:

- Submit a Statement of Qualification (“SOQ”) Application for the Project to the Massachusetts Department of Energy Resources for the Clean Peak Standard
- Once the SOQ has been received for the Project, Bidder (or its designee) will enroll the Project in the MassCEC Production Tracking System, with Clean Peak Energy Certificates to be minted to a New England Power Pool (“NEPOOL”) account
- As described in Section 4.5(e) of the Storage Environmental Attribute Purchase Agreement, Bidder shall either (i) cause the CPECs to be directly created in the EDCs NEPOOL GIS accounts with each EDC as the initial owner, (ii) effect an irrevocable Forward Transfer Certificate, or (iii) transfer the CPECs to the designated EDC accounts within 10 Business Days of when such attributes become available for transfer

[REDACTED]

It is the Bidder’s understanding that current ISO-NE GIS rules and protocols would allow the CPEC deliveries described without any rule changes required. This is evidenced by the public reports of CPEC Issuances by NEPOOL GIS¹ to similar Energy Storage Projects.

¹ <https://www1.nepoolgis.com/report/macps/issuance/public?apxReportTitle=MA%20CPS%20CPEC%20Issuances>

Section A-5: Financial and Legal

5.1 Please submit information and documentation that demonstrates that long term contracts resulting from this RFP Process would either permit the bidder to finance, or refinance, its proposal that would otherwise not be financeable or assist the bidder in obtaining financing of its proposal. Existing projects are not required to make a statement that demonstrates how a long-term contract would permit financing; however, existing projects should complete the sections below to the best of their ability.

[REDACTED]

5.2 Please provide a description of the business entity structure of the bidder's organization from a financial and legal perspective, including all general and limited partners, officers, directors, managers, members and shareholders, involvement of any subsidiaries supporting the project, and the providers of equity and debt during project development. Provide an organization chart showing the relationship between the equity and debt participants and an explanation of the relationships. For jointly owned facilities, identify all owners and their respective interests, and document the Bidder's right to submit a binding proposal.

[REDACTED]

5.3 Please provide a description of the financing plan for the project, including construction and term financing. The financing plan should address the following:

i. Who will finance the project (or are being considered to finance the project) and the related financing mechanism or mechanisms that will be used (i.e. convertible debenture, equity or other) including repayment schedules and conversion features

[REDACTED]

ii. Expected sources of debt and equity financing

[REDACTED]

iii. Estimated construction and other costs to develop and operate the project

[REDACTED]

iv. The projected capital structure

[REDACTED]

v. Describe any agreements, both pre and post commercial operation date, entered into with respect to equity ownership in the proposed project and any other financing arrangement.

[REDACTED]

In addition, the financing plan should address the status of the above activities as well as the financing of development and permitting costs. All bidders are required to provide this information.

[REDACTED]

5.4 Please describe any financial commitments to enter into long-term contracts with businesses, nonprofit organizations, a municipality or group of municipalities, or other sources of long-term revenue.

[REDACTED]

5.5 Please describe the status of the commitments with any offtakers, including any executed agreements, provided that such agreements may be contingent on the project being selected for contracting under this RFP

[REDACTED]

5.6 Provide documentation illustrating the experience of the bidder in securing financing for projects of similar size and technology. For each project previously financed provide the following information: i. Project name and location ii. Project type and size iii. Date of construction and permanent financing iv. Form of debt and equity financing v. Current status of the project

[REDACTED]

5.7 Please provide evidence that the bidder has the financial resources and financial strength to complete and operate the project as planned, including contingencies for project delays or cost overruns.

[REDACTED]

5.8 Please provide details of any financial difficulties by the bidder or any of its past or present affiliates which impaired the viability and/or financing of the development and construction of projects of similar type, size, and complexity of the proposed eligible project or other large scale renewable energy project, including any past terminated projects and claims of financial difficulties. Bidders must demonstrate how the proposed eligible project materially differs from any past projects and demonstrate fully the financial viability of the project as bid.

[REDACTED]

5.9 Describe the assumptions applied by Bidder regarding forecast changes in project costs during the contract term, interest rates over the development period, key input commodity prices, and the methodology used to establish the project contingency amount. Additionally, describe the assumptions made regarding forecasted revenue from other sources (including but not limited to energy arbitrage, capacity and ancillary services markets, or other contractual arrangements) as well as the measure of discount applied to the value of these other revenue streams. Bidder must explain why these assumptions are reasonable and describe and quantify how the project as proposed is designed to absorb sufficient risk to ensure the project can be successfully financed at the proposed price.

[REDACTED]

5.10 Provide complete copies of the most recent audited financial statement and annual report for each bidder for each of the past three years; including affiliates of the bidder (if audited statements are not available, reviewed or compiled statements are to be provided). Also, provide the credit ratings from Standard & Poor's and Moody's (the senior unsecured long term debt rating or if not available, the corporate rating) of the bidder and any affiliates and partners.

Audited financial statements for the past three years are included in Salt Cod_MA83E_A5.10_Financial Statements
Flatiron Energy and its subsidiaries are not rated.

5.11 Please also include a list of the board of directors, officers and trustees for the past three years and any persons who the bidder knows will become officers, board members or trustees.

Flatiron's board of directors is composed of its four partners, Juliana Mandell, Brett Cullen, Rob Brink, and Jon Poor, and two representatives selected by its parent Hull Street Energy, Scott Hofmeister and Steven Morris.

5.12 The bidder should demonstrate its ability (and/or the ability of its credit support provider) to provide the required security, including its plan for doing so.

[REDACTED]

5.13 Provide a description of any current or recent credit issues/ credit rating downgrade events regarding the bidder or affiliate entities raised by rating agencies, banks, or accounting firms.

Flatiron Energy and its subsidiaries are not rated and have not had any credit issues or credit downgrade events.

5.14 Describe the role of the Federal Investment Tax Credit (ITC”), and any other incentives or awards, on the financing of the project. In your response, please describe (a) your plan to qualify for the ITC and the level of the ITC for which you plan to qualify, (b) the facilities, investment in which, the ITC is expected to apply, (c) your plan to utilize the tax credits and the relationship to your financing plan, and (d) how qualification for the ITC is reflected in your proposed pricing. Please also describe qualification plans, applicability and utilization of any other Federal incentives or awards.

Bidders must clearly state their assumptions regarding the availability of federal or state tax credits, subsidies, or grants or other incentives, including but not limited to those available under the Inflation Reduction Act of 2022, the Infrastructure Investment and Jobs Act of 2022.

Bidders should describe any plans to meet federal domestic content and labor requirements in order to maximize federal tax credits available to the project under the Inflation Reduction Act (IRA). Bidders should also describe plans to pursue state funding available to energy storage projects.

[REDACTED]

5.15 Bidders must disclose any litigation or disputes in the last three year period related to projects developed, owned or managed by Bidder or any of its affiliates in the United States, or related to any energy product sale agreement.

Flatiron is not party to any pending or threatened litigation or disputes of any kind related to any energy product sale agreement.

5.16 What is the expected operating life of the proposed project? What is the depreciation period for all substantial physical aspects of the bid, including generation facilities, delivery facilities to move power to the grid, and mandatory and voluntary transmission system upgrades?

[REDACTED]

5.17 Has the bidder already obtained financing, or a commitment of financing, for the project? If financing has not been obtained, explain how obtaining a long-term agreement as proposed will help you in obtaining financing for the proposed project, in obtaining more favorable terms for the financing of the proposed project, or in supporting the future capital investment.

[REDACTED]

5.18 State whether the bidder or its affiliates have executed agreements with respect to energy, CPECs and/or capacity for the proposed project (including any agreements that have been terminated) and provide information regarding the associated term and quantities, and whether bidder has been alleged to have defaulted under or breached any such agreement. State whether the bidder or its affiliates have submitted proposals to other buyers, the status of consideration of such proposals, and the impact of such proposal(s), if they result in an executed contract or contracts, on the proposal(s) submitted in response to this RFP.

[REDACTED]

5.19 List all of the Bidder's affiliated entities and joint ventures transacting business in the energy sector.

[REDACTED]

5.20 Has Bidder, or any affiliate of Bidder, in the last five years, (a) consented to the appointment of, or been taken in possession by, a receiver, trustee, custodian or liquidator of a substantial part of its assets, (b) filed a bankruptcy petition in any bankruptcy court proceeding, (c) answered, consented or sought relief under any bankruptcy or similar law or failed to obtain a dismissal of an involuntary petition, (d) admitted in writing of its inability to pay its debts when due, (e) made a general assignment for the benefit of creditors, (f) been the subject of an involuntary proceeding seeking to adjudicate that Party bankrupt or insolvent, (g) sought reorganization, arrangement, adjustment, or composition of it or its debt under any law relating to bankruptcy, insolvency or reorganization or relief of debtors?

Flatiron has not undergone any of the instances described in 5.20 (a) through 5.20 (g).

5.21 Briefly describe any known conflicts of interest between Bidder or an affiliate of Bidder and any Distribution Company, or any affiliates of the foregoing.

Flatiron has no known conflicts of interest with the Distribution Companies.

5.22 Describe any litigation, disputes, claims, complaints or notices of violation or potential violation involving the project or other energy storage projects involving the Bidder or an affiliate of the Bidder.

Flatiron is not party to any pending or threatened litigation or disputes of any kind related to projects under development, ownership, or management by the Bidder.

5.23 Describe any failures to achieve commercial operation dates under other long-term contracts. Bidders should also provide a credible description of how the current proposed project will avoid similar project delays or development issues.

Flatiron has not experienced any failures to achieve commercial operation dates under other long-term contracts. Please see Section 10.1 for further information about the Project's schedule.

5.24 Describe any litigation, disputes, claims or complaints involving the Bidder or an affiliate of Bidder, against any Distribution Company or any affiliate of any Distribution Company.

Flatiron is not party to any pending or threatened litigation or disputes of any kind against the Distribution Companies.

5.25 Describe any litigation, disputes, claims or complaints, or events of default or other failure to satisfy contract obligations, or failure to deliver products, involving Bidder or an affiliate of Bidder, and relating to the purchase or sale of energy, capacity or environmental attributes or products.

Flatiron is not party to any pending or threatened litigation or disputes of any kind related to the purchase or sale of energy, capacity or environmental attributes or products.

5.25 Confirm that neither Bidder nor any directors, employees or agents of Bidder, nor any affiliate of Bidder are currently under investigation by any governmental agency, and that none of the above have in the last four years been convicted or found liable for any act prohibited by State or Federal law in any jurisdiction involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or have been the subject of any debarment action (detail any exceptions).

Flatiron is not currently under investigation by any governmental agency, and has not been convicted or found liable for any act prohibited by State or Federal law in any jurisdiction involving conspiracy, collusion or other impropriety with respect to bidding on any contract, or have been the subject of any debarment action.

5.26 Identify all regulatory and other approvals needed by Bidder to execute a binding sale agreement.

[REDACTED]

No regulatory approvals are required for the Bidder's execution of a binding sale agreement, though we recognize the EDCs will require the Contract resulting from this RFP to be approved by the Massachusetts Department of Public Utilities.

5.27 Describe how the project will conform to FERC's applicable regulatory requirements, including, but not limited to, FERC requirements relating to allocation of transmission capacity and open access, the justness and reasonableness of rates, the potential for undue preference or discrimination, and affiliate dealings, if any. Describe how your proposed approach is consistent with FERC precedent and ratemaking principles.

Salt Cod will operate in compliance with the rules set in the ISO-NE Open Access Transmission Tariff ("OATT"). The OATT has been approved by FERC as just and reasonable and ensures that all transmission owners and customers have fair and open access to the transmission system. As all transmission-connected projects in ISO-NE abide by it, the OATT ensures that no project will have undue preference.

5.28 Describe and document any and all direct and indirect affiliations and affiliate relationships, contractual, financial or otherwise in the past three years between the bidder and one or more of the Distribution Companies and their affiliates, including all relationships in which one of the Distribution Companies or their affiliates has a financial or voting interest (direct or indirect) in the bidder or the bidder's proposed project. These relationships include: i. Corporate or other joint arrangements, joint ventures, joint operations whether control exists or not; ii. Minority ownership (50% or less investee); iii. Joint development agreements; iv. Project agreements; v. Operating segments that are consolidated as part of the financial reporting process; vi. Related parties with common ownership; vii. Credit, debenture, and financing arrangements, whether a convertible equity feature is present or not; viii. Wholly owned subsidiaries; and viv. Commercial (including real property) relationships with any Distribution Company

Flatiron does not have any direct or indirect affiliations or affiliate relationships with any of the Distribution Companies.

Section A-6: Interconnection, Deliverability, and Reliability

6.1 Please provide documentation to show evidence of the interconnection request to ISO- NE, the applicable New England Transmission Owner, or any neighboring control areas, to interconnect at the Capacity Capability Interconnection Standard. Please describe the status of any planned interconnection to the grid.

[REDACTED]

6.2 Provide studies that describe the Project's electrical system performance, its impact to the reliability of the New England Transmission system, how the project would satisfy ISO NE's I.3.9 requirements, and how the project will interconnect at an equivalent to the Capacity Capability Interconnection Standard. Projects that do not have I.3.9 approval from ISO-NE must include technical reports or system impact studies that approximate the ISO-NE interconnection process, including but not limited to clear documentation of study technical and cost assumptions, reasoning, and justification of such assumptions. All projects must also provide analysis that approximates the ISO-NE CCIS interconnection analysis as defined in the applicable ISO-NE Planning Procedure(s). Please also provide the status and expected completion date of any additional interconnection studies already underway with ISO-NE and/or the transmission owner. All studies must follow the current ISO-NE interconnection procedures and detail any assumptions regarding resources ahead of the Project in the ISO-NE interconnection process as defined in the ISO-NE tariff and/or Planning Procedure(s). All network upgrades identified in these studies must be clearly documented and included in the bid price. Provide a copy of an interconnection agreement, if any, executed by the bidder with respect to the proposed project. If an interconnection agreement has not been executed, please provide the steps that need to be completed before an interconnection agreement can be executed and the associated timeline.

[REDACTED]

Copy of completed I.3.9 approval or I.3.9-equivalent study attached: ☐ If none, please explain:

[REDACTED]

Copy of completed CCIS-equivalent study attached: ☐ If none, please explain:

[REDACTED]

Copy of Interconnection Agreement attached: ☐ If none, please explain:

[REDACTED]

Additionally, any other studies undertaken by ISO-NE or the bidder must be provided

[REDACTED]

6.3 If multiple interconnection requests have been made, please specify all such active requests which have not been superseded by subsequent requests and information regarding the status of each. Provide copies of any requests made and studies completed.

[REDACTED]

6.4 Please provide cost estimates for any necessary network upgrades identified in the studies identified in 6.2.

[REDACTED]

6.5 To the extent that you provide an alternative interconnection scenario based on ISO- proposed interconnection process changes, you must also include studies using the proposed ISO-NE process. Any such studies must be accompanied with clear documentation of study technical and cost assumptions, reasoning, and justification of such assumptions.

[REDACTED]

6.6 Provide the electrical models of all energy resources supporting the proposed project in accordance with the filing requirements of the ISO-NE Tariff Schedule 22 and 23.

Electrical models attached: ☐ **If none, please explain:**

[REDACTED]

See attachment **Salt Cod_MA83E_A6_Models**.

6.7 Provide a copy of an electrical one-line diagram showing the interconnection facilities, the relevant facilities of the transmission and/or distribution provider, and any required network upgrades identified in the studies required in section 6.9 of this document

i. Electrical one-line diagram attached: ☒ **If none, please explain:**

Please refer to attachment **Salt Cod_MA83E_A6.7ii_Single Line Diagram**.

6.8 Specify and describe the current or new interconnection facilities (lines, transformers, switching equipment, system protection and controls, etc.) that bidder owns or is intending to construct or have constructed in order to deliver the proposed energy.

[REDACTED]

6.9 Please detail with supporting information and studies (as available) that the production/delivery profile contemplated in your proposal reflects constraints or curtailments, if any, after the upgrades that are expected to take place pursuant to interconnection at an equivalent to the CCIS. If you are planning to make voluntary upgrades beyond those associated with the CCIS-equivalent standard, please describe the transmission network upgrades necessary, their estimated cost (for which the bidder would have cost responsibility, and the impact on the proposed generation schedule by reducing remaining constraints or curtailments.

[REDACTED]

Section A-7: Siting, Permitting and Community Support

7.1 This section addresses permitting and other regulatory issues associated with project siting, development and operations for all phases of the project (including generation, delivery, storage, interconnection, etc.), and in all jurisdictions (state, local, federal). Provide a site plan (or plans) including a map (or maps) that clearly identifies the location of the proposed project site, energy storage project locations, the assumed right-of-way width, the total acreage for the Energy Storage System, the anticipated interconnection point (or, if applicable, multiple interconnection points), the related transmission and interconnection facilities, deployment facilities, and the relationship of the site to other local infrastructure, including transmission facilities, roadways, federal and state waters, and waterways. In addition to providing the required map(s), provide a site layout plan which illustrates the location of all major equipment and facilities described above

Plan included? Yes ☒ No ☐ If not, please explain:

Please refer to attachment: Salt Cod_MA83E_A7.1_Site Plan - ALTA Survey

7.2 Identify any real property rights (e.g., fee-owned parcels, rights-of-way, development rights or easements or leases, or options to purchase or lease) that provide the right to use the energy storage site any rights of way needed for interconnection.

- i. Does the project have a right to use the Eligible Facility site for the entire proposed term of the LTC (e.g., by virtue of ownership or land development rights obtained from the owner)?
Yes ☒ No ☐ If not, please explain.

If so, please detail the Bidder's rights to control the Energy Storage System site and interconnection locations.

[REDACTED]

Describe the status of acquisition of real property rights, any options in place for the exercise of these rights and describe the plan for securing the necessary real property rights, including the proposed timeline. Include these plans and the timeline in the overall project timeline.

[REDACTED]

Identify any joint use of existing or proposed real property rights

[REDACTED]

- ii. **Provide a copy of each of the leases, agreements, including option agreements, easements, rights of way and related documents granting the right to use the energy storage system site and transmission and interconnection locations (and applicable letters of intent if formal agreements have not been executed)**

Please refer to the following attachments:

[REDACTED]

7.3 Provide evidence that the Energy Storage System site and interconnection locations are properly zoned or permitted. If the Energy Storage System site and interconnection locations are not currently zoned or permitted properly, identify present and required zoning and/or land use designations and permits and provide a permitting plan and timeline to secure the necessary approvals.

[REDACTED]

Please refer to attachment: Salt Cod_MA83E_A7.3_Zoning Memo

7.4 Permitting plan and timeline - Enter appropriate explanation in this space or reference applicable attachment(s)

Please refer to the attachment: Salt Cod_MA83E_A7.7_Permit Matrix and Timeline

7.5 Provide a description of the area surrounding the Energy Storage System site and interconnection locations, including a description of the local zoning, flood plain and aquifer information, existing land or waterway use, and setting.

Please refer to the attachment: Salt Cod_MA83E_A7.5_Site Area Description

7.6 If the bidder does not have interconnection facilities site control describe the status of the plan to obtain that control.

[REDACTED]

7.7 Provide a list of all the permits, licenses, and environmental assessments and/or environmental impact statements required to construct and operate the project. Along with this list, identify the governmental agencies and municipalities that are responsible for issuing approval of all the permits, licenses, and environmental assessments and/or environmental impact statements. If a bidder has secured any permit or has applied for a permit, please indicate this in the response.

Please refer to the attachment: Salt Cod_MA83E_A7.7_Permit Matrix and Timeline.

7.8 Provide the anticipated timeline for seeking and receiving the required permits, licenses, and environmental assessments and/or environmental impact statements. Include a project approval assessment which describes, in narrative form, each segment of the process, the required permit or approval, the status of the request or application and the basis for projection of success by the milestone date. All requirements should be included in the project schedule in Section 10.

Please refer to the attachment: Salt Cod_MA83E_A7.7_Permit Matrix and Timeline.

[REDACTED]

7.9 Provide information (a) demonstrating past and current productive relationships with host communities, federally recognized and state acknowledged tribes, Environmental Justice communities and other stakeholders; and (b) demonstrating your track record of avoiding, minimizing, and mitigating environmental, tribal, and environmental justice impacts from energy storage projects similar to the proposed project.

A full summary of our current and future activities of our Salt Cod Project is outlined in Salt Cod_MA83E_A7.10_Stakeholder Engagement Plan.

[REDACTED]

7.10 Provide documentation identifying the level of public support for the project including letters from public officials, newspaper articles, etc. Include information on specific host community and localized support and/or opposition to the project of which the bidder is aware. Provide copies of any agreements with communities and other constituencies impacted by the project. Provide a stakeholder map and a plan for community engagement activities and targeted stakeholder outreach.

[REDACTED]

Section A-8: Safety Plan

8.1 Please attach a detailed safety plan that demonstrates compliance with all relevant federal, state, and local laws, codes, and standards.

Please refer to the attached Salt Cod_MA83E_A8.1_Safety Site Plan.

The project will be designed to meet and/or exceed all relevant fire and life safety codes and standards including full compliance with NFPA 855 as well as the requirements of the Massachusetts Fire Code.

Additionally, the project will comply with all other relevant building and electrical codes as well as typical industry standards and practices.

[REDACTED]

8.2 Please include a discussion on incident preparedness and address all steps the project has taken to avoid potential safety issues, mitigate safety issues when they occur, and protect property, personnel, and the surrounding community.

Please refer to the attached:

- Salt Cod_MA83E_A8.2_Emergency Response Plan
- [REDACTED]

The Project is designed and operated with a comprehensive focus on safety, reliability, and community protection. Safety planning is integrated into every stage—design, construction, commissioning, and operations. The following measures demonstrate our approach to incident preparedness and risk management:

- **Prevention of Safety Issues**
 - Compliance with Standards: All systems are designed and certified in accordance with UL 9540, NFPA 855, and local applicable codes and standards.

[REDACTED]

This comprehensive approach ensures that safety risks are minimized, that effective measures are in place to mitigate incidents should they occur, and that property, personnel, and the surrounding community remain well-protected throughout the lifecycle of the project.

8.3 Please describe plans and measures to operate the facility safely, including but not limited to monitoring and maintenance procedures, mitigation features and potential failure modes.

Operating the facility safely is the highest priority of Flatiron. The Project has been designed with multiple layers of protection—through monitoring systems, routine maintenance, and built-in safety features—to ensure safe and reliable operation throughout its lifetime.

[REDACTED]

Together, these measures ensure safe, reliable operation while protecting personnel, property, and the community.

8.4 Please describe consequences resulting from various levels of potential failures and safety events.

The Battery Energy Storage System (BESS) has been designed with multiple layers of safety and containment

[REDACTED]

8.5 Please discuss intentions to continuously improve the safety practices while operating the facility, such as plans for regular safety audits and feedback mechanisms.

Safety is not treated as a one-time design feature but as an ongoing commitment throughout the life of the facility. Our operations plan includes proactive measures to ensure that safety practices evolve with industry standards, lessons learned, and stakeholder input.

[REDACTED]

8.6 Please describe reporting protocols, both internally and externally.

[REDACTED]

8.7 The project is encouraged to include testimonials and statements of support from local governments and first responder organizations to demonstrate robust stakeholder communication and participation in the project's safety plan.

The Project will continue to engage with all relevant stakeholders for the Project in line with our Stakeholder Engagement Plan, provided in attachment Salt Cod_MA83E_A7.10_Stakeholder Engagement Plan, which includes local governments and first responder groups. The project team has successfully [REDACTED].

Section A-9: Engineering and Technology; Commercial Access to Equipment

This section includes questions pertinent to the engineering design and project technology. This section must be completed for all aspects of a project including but not limited to the Energy Storage System and associated operational plan and interconnection facilities. Bidders should provide information about the specific technology or equipment including the track record of the technology and equipment and other information as necessary to demonstrate that the technology is viable.

9.1 Provide a reasonable but preliminary engineering plan which includes the following information:

- i. Type of energy storage technology (e.g., mechanical, chemical, thermal) and the specific details of the energy storage technology and how it works**

The project utilizes electrochemical energy storage technology in the form of lithium-ion batteries. The project is utilizing Lithium Iron Phosphate (“LFP”) cells, which is widely deployed in both stationary energy storage systems as well as electric vehicles. LFP cells are generally preferred for stationary applications due to their increased thermal and chemical stability compared to other sub-chemistries.

Lithium-ion batteries work by moving lithium ions back and forth between the anode and cathode through an electrolyte solution. Under a charging scenario, an external source forces positively charged lithium ions to move from the cathode, through the electrolyte, to the anode where they are stored between layers of graphite. Negatively charged electrons flow through the external circuit into the anode to balance the charge in the system. The discharging scenario reverses this process by allowing the lithium ions to travel back to the cathode through the electrolyte, while the electrons flow through the external circuit.

The power conversion system (“PCS”) regulates the charging and discharging process and is responsible for converting AC power to DC during charging mode, and DC power to AC during discharging mode. It also is responsible for sourcing or absorbing AC reactive power to allow for a full four quadrant operation.

- ii. Major equipment to be used including the components of the energy storage technology itself and surrounding system (e.g., inverter, enclosures, HVAC, meters, electrical and communication equipment, fire suppression).**

[REDACTED]

The equipment specification will be finalized as part of the project execution process utilizing either [REDACTED] or an equivalent Tier 1 ESS provider. The technical solution will either meet or exceed the established safety, quality, technical, and performance requirements for the project.

Manufacturer of each of the equipment components listed above as well as the location of where each component will be manufactured.

[REDACTED]

Status of acquisition of the equipment components, including whether orders are in place and/ or production slots secured

[REDACTED]

Whether the bidder has a contract for the equipment. If not, describe the bidder's plan for securing equipment and the status of any pertinent commercial arrangements

[REDACTED]

iii. Equipment vendors selected/considered

For all major equipment, the project team evaluated all Tier 1 suppliers and selected the preferred OEM based on multiple different factors including product and system level safety, QA/QC programs and quality record, domestic production and/or service capability, product and technology maturity, system integration requirements, etc. Detailed below are a subset of the suppliers considered for the project. The ESS equipment specification will be finalized as part of the project execution process. The technical solution will either meet or exceed the established safety, quality, technical, and performance requirements for the project.

[REDACTED]

Track record of equipment operations, including safety record

[REDACTED]

Include all UL certifications and other relevant industry codes and standards for key equipment including but not limited to storage modules, power conversion system, and/or integrated product certifications

[REDACTED]

Description of equipment warranties and guarantees, including terms and expiration

[REDACTED]

If the equipment manufacturer has not yet been selected, identify in the equipment procurement strategy the factors under consideration for selecting the preferred equipment

[REDACTED]

9.2 If the bidder has not yet selected the major equipment for a project, please provide a list of the key equipment suppliers under consideration.

[REDACTED]

9.3 Please identify the same or similar equipment by the same manufacturer that are presently in commercial operation including the number installed, installed capacity and estimated generation for the past three years.

[REDACTED]

9.4 For less mature technologies or equipment, provide evidence (including identifying specific applications) that the technology or equipment to be employed for energy production is ready for transfer to the design and construction phases. Also, address how the status of the technology or equipment is being considered in the financial and permitting plans for the project. Provide the status of testing/qualification for any equipment in development.

All equipment and technology that will be utilized on the project is commercially available including completion of testing and qualification of the equipment per the latest industry codes and standards.

9.5 Please indicate if the bidder has a full and complete list of equipment needed for all physical aspects of the bid, including the Energy Storage System and all equipment required for the System to fulfill its operational plan, and mandatory and voluntary transmission system upgrades. Include OEM-supplied data sheets for all equipment. If bidder does not have a full and complete list of equipment, identify the areas of uncertainty and when the full and complete list of equipment will be identified.

[REDACTED]

9.6 Please indicate if the bidder has secured its equipment for all physical aspects of the bid, including the Energy Storage System and all equipment required for the System to fulfill its operational plan, and mandatory and voluntary transmission system upgrades. If not, identify the long-lead equipment and describe the timing for securing this equipment.

[REDACTED]

Section A-10: Project Schedule

A bidder must demonstrate that its proposal can be developed, permitted, financed, and constructed and be technically viable within a commercially reasonable timeframe. The bidder is required to provide sufficient information and documentation that shows that the bidder’s resources, process and schedule are adequate for the acquisition of all rights, permits and approvals for all aspects of the project and for the financing of the project consistent with the proposed project milestone dates.

Bidders are required to provide a complete critical path schedule for the project from the notice of selection of the project for contract consideration to the start of commercial operations. For each project element, list the start and end date. The proposal must include a schedule with reasonable detail that demonstrates that the bidder has provided sufficient time for the application for, and receipt of, necessary permits, approvals, other commitments, project financing, completion of design work, and equipment procurement and construction in order to credibly complete the project reasonably consistent with the proposed Commercial Operation Date, meaning that the project is more likely than not to come online by the date that is projected within the proposal. The bidder should include critical milestones in its markup to the Form LTC that are consistent with its proposal and are reasonably achievable.

10.1 Identify the elements on the critical path. The schedule should include, at a minimum, preliminary engineering, financing, acquisition of real property rights, Federal, state and/or local permits, licenses, environmental assessments and/or environmental impact statements (including anticipated permit submittal and approval dates), completion of interconnection studies and approvals, procurement, facility contracts, start of construction, construction schedule, and any other requirements that could influence the project schedule and the commercial operation date.

[REDACTED]		
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10.2 Describe and demonstrate that the project is more likely than not to come online by the commercial operation date that is projected within the proposal, as evidenced by documents filed by the bidder showing the following:

Commencement of permitting processes;

[REDACTED] and Salt Cod_MA83E_A7.7_Permit Matrix and Timeline for further details on permitting schedule.

i. A plan for completing all permitting processes;

Please refer to attachment Salt Cod_MA83E_A7.7_Permit Matrix and Timeline for schedule of permitting activities.

Environmental assessment;

[REDACTED]

ii. Viable financing plans along with detailed information requested in Section 2.2.2.4;

The Project’s financing plan is discussed in Section 5.3.i., which includes the funding of development costs and source of funding for credit support.

Please see Section 5.9 for detailed information regarding the forecast changes in project costs, interest rates over the development period, equipment costs, contingency amounts, and forecasted revenues. Flatiron has not terminated any of its projects due to financial difficulties.

Viable installation and electrical interconnection plans;

[REDACTED]

Material progress towards the acquisition of all real property rights; and

[REDACTED]

Evidence of material vendor activity.

[REDACTED]

10.3 Detail the status of all critical path items, such as receipt of all necessary siting, environmental, and ISO-NE approvals.

[REDACTED]

Please see the table in section 10.1 for the expected completion dates of each of the Project's critical path items.

Section A-11: Construction and Logistics

This section of the proposal addresses necessary arrangements and processes for assembly, and deployment of major project components, including the Energy Storage System and all equipment required for the system to fulfill its operational plan, and other major components associated with delivery facilities. Please provide a construction plan that captures the following objectives:

11.1 Please list the major tasks or steps associated with deployment of the proposed project and any necessary specialized equipment.

[REDACTED]

11.2 Please describe the proposed approach for staging and deployment of major project components to the project site.

Most of the required project equipment will come to site right before the scheduled activity. There are various laydown areas within the site boundaries that will enable the laydown of required equipment and materials. For large project equipment, such as batteries, transformer, and power conversion systems, the project will utilize a “just in time” delivery approach, where the trucks will arrive on site, and the Contractor will immediately offload for installation. This is the most efficient use of space on site, as the project equipment will not sit idle on site without being installed.

11.3 List the party (e.g. the bidder, or equipment/service providers under contract to the bidder) responsible for each deployment activity and describe the role of each party. Describe the status of bidder’s contractual agreements with third-party equipment/service providers.

[REDACTED]

Section A-12: Operations and Maintenance

Projects that can demonstrate that the operation and maintenance (“O&M”) plan, level of funding, and mechanism for funding will ensure reliable operations of all aspects of the project during the term of the contract are preferred.

12.1 Provide an O&M plan for the project that demonstrates the long term operational viability of the proposed project. The plan should include the location of the O&M base, a discussion of the staffing levels proposed for the project, the expected role of the project sponsor or equipment manufacturer/outside contractor, scheduling of major maintenance activity, and the plan for testing equipment.

[REDACTED]

12.2 Describe in detail the proposed O&M funding mechanism and funding levels to support planned and unplanned O&M requirements.

[REDACTED]

12.3 Describe the terms (or expected terms) of the warranties and/or guarantees on major equipment that the bidder is utilizing or proposing to utilize.

[REDACTED]

12.4 Describe the status of the project sponsor in securing any O&M agreements or contracts. Include a discussion of the sponsor’s plan for securing a medium-term or long-term O&M contract, including the expected provider of O&M services.

[REDACTED]

12.5 Provide examples of the bidder’s experience with O&M services for other similar projects.

Flatiron Energy’s skilled energy storage asset management team will oversee the execution of O&M services by [REDACTED].

Section A-13: Project Management and Experience

Bidders are required to demonstrate project experience and management capability to successfully develop and operate all aspects of the project proposed. The Evaluation Team is particularly interested in project teams that have demonstrated success in projects of similar type, size and technology and can demonstrate an ability to work together effectively to bring the project to commercial operation in a timely fashion.

13.1 Provide an organizational chart for the project that lists the project participants and identifies the corporate structure, including general and limited partners.

The organizational chart below shows the project participants and corporate structure of the proposed Project.

[REDACTED]

13.2 Provide statements that list the specific experience of the bidder and each of the project participants (including, when applicable, the bidder, partners, and proposed contractors), in developing, financing, owning, and operating generating and delivery facilities, other projects of similar type, size and technology, and any evidence that the project participants have worked jointly on other projects.

[REDACTED]

Please see section 13.4 for additional information on the experience of the bidder working on similar projects to Salt Cod.

13.3 Provide a management chart that lists the key personnel dedicated to this project and provide resumes of the key personnel. Key personnel of the bidder's development team having substantial project management responsibilities must have:

- i. Successfully developed and/or operated one or more projects of similar size or complexity or requiring similar skill sets; and**
- ii. Experience in financing power generation projects (or have the financial means to finance the project on the bidder's balance sheet).**

Flatiron Energy Experience

Flatiron Energy is an independent power producer (IPP) exclusively focused on the development, construction, and operation of utility-scale standalone energy storage projects. The company has a pipeline of over [REDACTED] of standalone storage projects primarily located in the Northeast. The Flatiron Energy leadership team has over 60 years of collective experience working in standalone energy storage and over 100 years of combined experience working in the power and finance industries. Flatiron's managing partners have worked together in various formations for over ten years and across three organizations. During that time, the Flatiron Energy leadership team has been directly responsible for successfully developing and delivering over 20 operational and profitable standalone energy storage projects.

[REDACTED]

The Flatiron team brings to the development of Salt Cod Storage strong regional expertise. [

REDACTED]

Flatiron is a portfolio company of Hull Street Energy ("HSE"), a well-capitalized woman-led private equity firm dedicated to investing in the clean energy transition. Formed in 2016, Hull Street Energy has successfully raised multiple fund investments.

[REDACTED]

HSE brings over 25 years of senior management experience in power plant development, energy markets, asset operations, and finance to benefit the Flatiron team.

[REDACTED]

Leadership Team

Please see Salt Cod_MA83E_A13.3_Organizational Chart for a management chart of the company and Salt Cod_MA83E_A13.3_Key Personnel Resumes for resumes of Flatiron Energy's leadership team.



Jonathan Poor, Chief Operations Officer

Jonathan has 25 years of experience in the energy industry with 9 of those years focused on energy storage. He has held leadership roles in development, consulting, project management, and engineering. Prior to Flatiron, he worked at ENGIE Storage, National Grid, General Electric, and Navigant. He holds a bachelor's degree from Massachusetts Maritime Academy and an MBA from Babson College.



Rob Brink, Chief Financial Officer

Rob has 17 years of experience in energy, consulting, and finance; with 9 years focused on energy storage. He has held leadership roles in financing, acquisitions, sales, and battery optimization. Prior to Flatiron, he worked at ENGIE Storage, Advanced Microgrid Solutions, General Electric, and Deutsche Bank. He holds a bachelor's degree and an MBA from Cornell University.



Juliana Mandell, Chief Commercial Officer

Juliana has 15 years of experience in the energy industry with 10 years focused on energy storage. She has held leadership roles in project development, acquisitions, market development and regulatory affairs. Prior to Flatiron, she worked at ENGIE Storage, General Electric, and Sungevity. She has developed over 1 GW of battery storage projects. Of note, she led first-of-a-kind commercial structuring and market development across over 20+ front-of-the-meter projects. She holds a bachelor's degree from the University of California at Berkeley and a master's degree from Columbia University.



Brett Cullen, Chief Development Officer

Brett has 14 years of experience in the energy industry with 5 years focused on energy storage. He has held leadership roles in greenfield development, acquisitions, finance, and transmission modeling. Prior to Flatiron, he worked at ENGIE Storage, SoCore Energy, and Navigant. He holds a bachelor's degree from Illinois Wesleyan University and a master's degree from the University of Chicago.



Dan Myers, Chief Investment Officer

Dan has more than 11 years of experience in capital markets focusing on power generation across industry-leading developers and project sponsors. Across his career, Dan has led or participated in over \$21 billion of capital formation activities supporting over 10 GW of operating power generation or related assets. Prior to Flatiron, he worked with Intersect Power, Avantus, Monolith, and SunEdison. He graduated from St. Louis University with a bachelor's degree and is a CFA Charterholder.

13.4 Provide a listing of all projects the project sponsor has successfully developed or that are currently under construction. Provide the following information as part of the response: i. Name of the project, ii. Location of the project, iii. Project type, size and technology, iv. Commercial operation date, v. Availability factor of the project for the past three years, vi. Safety record, vii. References, including the names and current addresses and telephone numbers of individuals to contact for each reference.

[REDACTED]

The Flatiron leadership team brings deep experience developing, financing, and constructing utility-scale, standalone energy storage projects to Energizar. Please see attachment Salt Cod_MA83E_A13.4_Projects Experience List for an indicative list of projects Flatiron team members have successfully developed in previous roles. Flatiron is happy to provide more detail on any project per request from the MA DOER.

13.5 With regard to the bidder's project team, identify and describe the entity responsible for the following, as applicable:

i. Construction Period Lender

[REDACTED]

Operating Period Lender and/or Tax Equity Provider

[REDACTED]

Financial Advisor

[REDACTED]

iv. Environmental Consultant

The following entities have been retained for environmental studies for Salt Cod Storage:

[REDACTED]

v. Facility Operator and Manager

[REDACTED]

vi. Owner's Engineer

[REDACTED]

vii. Transmission/Delivery Consultant

[REDACTED]

viii. Legal Counsel

[REDACTED]

13.6 Describe the experience and expertise of the bidder and project team needed to successfully develop, finance, construct, and operate and maintain its proposed eligible project on schedule and according to the bidder's commitments to a competitive procurement process. Describe the Bidder's continuity of corporate management through successful project development.

Prior to starting Flatiron, its four partners worked together in various formations at several organizations including ENGIE N.A. and General Electric. Each partner leads a core group with the Flatiron organization, managing projects from prospecting to operation. Please see Sections 13.3 and 13.4 for details on Flatiron's experience successfully bringing projects to operation.

[REDACTED]

13.7 Describe the Bidder's track record developing similar projects, including consideration of any project delays, amendments, defaults, and performance issues, including on prior long-term contracts. Describe any prior failures to achieve commercial operation dates under other contracts and provide a credible description of how the current proposed project will avoid similar project delays or development issues if applicable.

For additional detail on Flatiron's track record developing similar projects please see Section 13.2 and 13.4.

[REDACTED]

Flatiron leverages an experienced team, local expertise, and Tier 1 suppliers to help protect against future project delays.

13.8 Describe the bidder's relevant experience supporting similar projects in a state or federal regulatory or judicial forum. This experience can be established with examples of one or more key member(s) of the development team advocating in favor of a similar project in a regulatory proceeding, before a court, or in another tribunal.

The Flatiron regulatory team has experience advocating for projects at the legislative, regulatory, ISO, and FERC level in regions across the country with an emphasis on the Northeast. [REDACTED]

13.9 If the bidder or any of its past or present affiliates has either (1) been involved with a complex development project that failed, was withdrawn, or otherwise did not proceed, or (2) defaulted under, or agreed to terminate a contract for a complex development project, then the bidder should provide relevant details.

[REDACTED]

Section A-14: Economic Development and Employment Benefits, Transitioning Fossil Fuel Communities, Benefits to Low Income Ratepayers and Environmental Justice Communities, and Other Benefits

14.1 Please provide an estimate of the number of jobs to be created directly during project development and construction, and during operations, and a general description of the types of jobs created, duration of employment, estimated annual compensation, the employer(s) for such jobs, and the location. Employment impacts should be broken out by state and the region as a whole and highlight any impacts in economically distressed areas, including former fossil fuel communities. Please treat the development, construction, and operation and maintenance periods separately in your response. All information provided must be measurable.

The attached Salt Cod_MA83E_A14.1_SER_Economic Impact Analysis outlines the expected job creation for the Project. [REDACTED]

During the development and construction periods, typical jobs would include project management, engineering, community engagement, environmental and permitting specialists, construction trades, civil engineering, heavy equipment operators, electricians, construction management, and QA/safety. During the operating period of an energy storage asset, typical jobs would include Operations and Maintenance technicians, Electrical technicians, Remote Operations Center operators, Energy Asset Managers, Regulatory and Market analysts, and site safety managers.

14.2 Please describe employment opportunities for members of federally recognized and state acknowledged tribes in the Commonwealth, workers from low-income communities and certified minority-owned and women-owned small business enterprises in the Commonwealth, as well residents of any Environmental Justice neighborhoods impacted by the project.

Attachment Salt Cod_MA83E_A14.1_SER_Economic Impact Analysis demonstrates the potential jobs that will be created [REDACTED]

14.3 Please describe project support for workforce harmony and community benefits through Community Benefits Agreements and workforce agreements with appropriate labor organizations for construction, renovation, reconstruction, alteration, installation, demolition, expansion, maintenance and repair, if applicable.

[REDACTED]

14.4 Please describe the status of any contractual commitments with respect to direct job creation and provide any pertinent agreements that have been executed, if applicable.

Flatiron has executed project-specific contracts with other Massachusetts based businesses and individuals for a variety of project-related services. Please refer to the following attachments:

[REDACTED]

14.5 Please describe any plans to meet federal domestic content and labor requirements in order to maximize federal tax credits available to the project under the Inflation Reduction Act (IRA).

The Salt Cod Project is expected to qualify for the Investment Tax Credit under the Inflation Reduction Act. Please see response in Section 5.14 for further detail.

14.6 Please describe and quantify any other economic activity or development expected to result directly from the proposed project. Impacts should be broken out by state and the region as a whole and highlight any impacts in economically distressed areas or former fossil fuel communities. Direct economic activity/development will be evaluated based on scale relative to project size, credibility and firmness. Preference will be given to commitments that secure long- term benefits; begin to provide benefits during project development, construction, installation, and the first five years of operations; direct benefits to Environmental Justice populations and host communities.

[REDACTED]

14.7 Please demonstrate any benefits to low-income ratepayers in the Commonwealth and describe how the project minimizes and mitigates, to the extent feasible, ratepayer impacts. Benefits to low-income ratepayers may include, but are not limited to, projects that reduce the energy burden for low-income ratepayers through energy efficiency or renewable energy upgrades; direct funding of rate relief through grant programs, support of existing community programs or other funding opportunities. Describe the impact, if any, those benefits will have on the cost to the project.

Energy Storage resources like this Project will improve grid reliability, lower wholesale electric system costs, and deliver benefits to ratepayers across the Commonwealth. Battery storage lowers costs to ratepayers by charging when prices are low and there is surplus renewable or other generation and discharging during peak hours when prices would otherwise spike. This additional storage capacity flattens the supply curve, dampening peak prices and reducing reliance on expensive peaking generators. This Project will also participate in Ancillary Services and in the Capacity Market, providing key grid stability services and adding carbon-free supply. By increasing competition in the energy, ancillary services, and capacity markets, this Project will lower market-wide clearing prices and benefit all Massachusetts ratepayers.

[REDACTED]

14.8 Please describe benefits to transitioning fossil fuel communities, including how the community can be described as a fossil fuel community, including but not limited to hosting fossil fuel infrastructure such as fuel storage, delivery facilities, or fossil fuel generation facilities.

[REDACTED]

14.9 Please provide a diversity, equity and inclusion plan that includes a Workforce Diversity Plan and the Supplier Diversity Program Plan as outlined in Section 2.2.2.13 of the RFP.

Workforce Diversity Plan

Flatiron is proud of its culture, which respects and embraces the diversity of its people, their beliefs, and their ideas. As part of its hiring practices, Flatiron is committed to recruiting a diverse and qualified workforce at all levels of the organization.

Flatiron does not discriminate and is committed to providing equal opportunity for all employees, both current and prospective, and requires the same of all its contractors and suppliers. The following is an excerpt from the Flatiron Energy Employee Handbook:

Flatiron Energy is an equal opportunity employer and does not discriminate. We extend equal opportunity to all individuals without regard to race, religion, color, sex (including pregnancy, sexual orientation, and gender identity), national origin, disability, age, genetic information, or any other status protected under applicable federal, state, or local laws.

Our policy reflects and affirms Flatiron Energy's commitment to the principles of fair employment and the elimination of all discriminatory practices.

Additionally, Flatiron Energy is a certified B Corporation, which requires inclusive and equitable practices in its hiring and employment practices.

A workforce diversity plan has been provided in attachment Salt Cod_MA83E_A14.9_Workforce Diversity Plan.

Supplier Diversity Program Plan

Flatiron conducts transparent competitive procurements for its major equipment and construction contracts that aim to source the most effective technology and services without discrimination. As its projects achieve development maturity, Flatiron issues an RFP to market inviting suppliers to propose their BESS technology for consideration. Flatiron then uses sophisticated key evaluation and selection metrics, including domestic

content supply chain, integration experience, operational track record, etc. to select the best equipment for each project's needs.

A supplier diversity program plan has been provided in attachment Salt Cod_MA83E_A14.9_Supplier Diversity Program Plan.

14.10 Please describe the strategy and mechanisms to track and report on any applicable commitments, including progress in achieving promised employment and economic benefits and the goals in the diversity, equity and inclusion plan, based on the template provided in the Form MOU with DOER and any other supplemental plans for tracking and reporting.

Flatiron will conduct annual reporting in line with the requirements of the MOU as to be negotiated with the DOER.

14.11 Please provide a marked version of the Form MOU with DOER for this solicitation showing any specific proposed changes to the Form MOU. Bidders are discouraged from proposing any material changes or conditions to the Form MOU and any such changes will be considered in the Stage Two Qualitative Evaluation.

[REDACTED]

14.12 Please propose a strategy plan to track and report on the status of environmental justice impacts, and engagement and employment (training, recruitment and hiring goals) opportunities, based on the template provided in the Form MOU with DOER and any other supplemental plans for tracking and reporting.

Flatiron's approach to development includes careful monitoring and management of community impact, engagement, and employment opportunities. Flatiron's deep experience in project development, and in successful asset management, emphasizes a data driven approach to successful community engagement. The categories of information provided by DOER in 1(a)-(1(j) of Appendix H are routinely tracked, and Flatiron is excited to work with DOER pursuant to the terms of the MOU to facilitate these opportunities.

14.13 Please describe experience with stakeholder engagement showing demonstrated past and current productive relationships with environmental, commercial and residential stakeholders, federally recognized and state acknowledged tribes, Environmental Justice, and track record of avoiding, minimizing, and mitigating environmental, tribal, environmental justice, and onshore impacts from projects similar to the proposed project.

Flatiron Energy has experience working with communities across Massachusetts, developing battery storage projects. [REDACTED]

The past and current activities of our Salt Cod Project are outlined in Appendix C of Salt Cod_MA83E_A7.10_Stakeholder Engagement Plan, which provides a running log of all activities to date, while earlier sections outline future activities as the project progresses.

14.14 Please describe extent to which the project demonstrates that it avoids, minimizes, or mitigates, to the maximum extent practicable, environmental impacts. Preliminary characterization of the potential environmental impacts facility and other infrastructure from pre- construction through the duration of the project.

[REDACTED]

14.15 Please describe extent to which the project demonstrates that it avoids, minimizes, or mitigates, to the maximum extent practicable, negative impacts on Environmental Justice populations and host communities, and extent to which the project directs positive benefits from the project to those communities.

The Salt Cod project demonstrates a strong commitment to avoiding, minimizing, and mitigating negative impacts on Environmental Justice (EJ) populations and host communities, to the maximum extent practicable.

[REDACTED]

Section A-15: Exception to Form Long-Term Contract

Please attach an explanation of any exceptions to the Form Long Term Contract set forth in Appendices B-1 and B-2. Comments to the proposed Form Long-Term Contract must include any specific alternative provisions in a redline format to the Form Long-Term Contract.

Please see below for a list of key areas in the template Long-Form Contracts that Flatiron would like to discuss. The table is non-exhaustive but hopefully provides a view on the limited terms that Flatiron would intend to revise in order to achieve a financeable offtake agreement. We are confident in our ability to find a workable solution with each Buyer. Please see attachment Salt Cod_MA83E_A15_Redline Eversource_Unitil, and Salt Cod_MA83E_A15_Redline NGrid, for full redline comments to each Long-Form Contract. A word version of these agreements is available upon request.

[REDACTED]