



January 30, 2026

Via electronic filing: Thomas.Ferguson@mass.gov

RE: 83E Stakeholder Comments - REDACTED

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

Dear Mr. Ferguson,

In addition to the filed with the Joint Storage Developers, Nexamp appreciates the opportunity to provide additional, confidential information, in response to Section 83E Round 2 Stakeholder Question 4, on anticipated revenue streams for distribution assets.

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

We strongly support the Commonwealth's leadership in advancing decarbonization and energy reliability and appreciate the clear signal from MA DOER regarding the inclusion of distribution connected resources in the next round of the Section 83E Mid Duration energy storage procurement. We encourage MA DOER to provide guidance on timing of the second and third round procurement, the uncertainty around market opportunities and tariffs for distribution connected storage in Massachusetts has stalled development. While of course project development involves inherent risk, a line of sight into state programs and support for distribution connected resources will help reignite much needed development and move the state towards its goals.

First and foremost we encourage MA DOER to publish the anticipated schedule and eligibility requirements for the second round Section 83E procurement as soon as possible.

Please find Nexamp's response to Stakeholder Question 4 below:

4. Please provide your assessment of the proportional contribution of all revenue streams—both current and projected—to the overall economics of your proposed storage system (e.g., arbitrage, reserves, capacity, ancillary services, environmental attributes). How do you expect these proportions to evolve over a shorter time horizon (the next 5–10 years) or longer time

horizon (up to 30 years) in the ISONE region? Please provide anticipated percentage ranges, and any underlying probabilistic assumptions (e.g. P90, P50, P10) where possible.

Response: Nexamp engages with multiple vendors to assess forecasted market prices for CPECs. Ahead of upcoming CPEC procurements, there is broad alignment across vendors that market CPEC prices are expected to decline in the near to medium term (approximately 5–10 years). Over the longer term, CPEC prices are projected to increase and converge toward the ACP.

Capacity revenues are expected to comprise a declining share of the overall revenue stack over time. Ancillary services are not anticipated to represent a material revenue source, as continued battery deployment across New England is expected to rapidly erode available market opportunities for these services.

The figure below illustrates the forecasted proportional revenue breakdown for a 5 MW / 20 MWh battery energy storage system located on a non-DCM-eligible circuit.

<FIGURE REDACTED>

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

Thank you,

Lisa Boba
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