

August 31, 2023

Thomas Ferguson, PhD
Energy Storage Programs Manager
Massachusetts Department of Energy Resources (DOER)
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: Comments on Energy Storage Study

Dear Mr. Ferguson,

We are writing to provide comments on the energy storage study commissioned by DOER and MassCEC. We understand that this study assumes that peak requirement for electricity in Massachusetts will double to 50GW by 2050, due to increasing electrification, and that this increase in peak requirement will fluctuate greatly as more renewable sources of electricity, primarily wind and solar, come online resulting in an increased need for energy storage capacity in the State.

We are very concerned about the policy recommendations DOER may make, based on results of the energy storage study, and the impact such policies may have on the operation of industrial hydropower facilities in the State, particularly the operation of the Northfield pumped-storage hydroelectric facility owned by FirstLight Power, which is currently in the process of being relicensed by FERC.

Our comments are as follows:

1. In making any policy recommendations based on the energy storage study, DOER should recognize and take into account the severe damage to river ecosystems caused by industrial hydropower facilities such as the Northfield facility and the magnitude increase in such damage that will occur if facilities such as Northfield are permitted and incentivized to increase their operations to meet the projected increase in demand for energy storage reflected in the study.

The ongoing destruction of the Connecticut River ecosystem caused by the Northfield facility is widely known and well-documented, including in numerous comments submitted by stakeholders and members of the public over the decade-long course of the FERC relicensing of the Northfield facility. Any increase in Northfield's operations would wreak further devastation on the CT River and should not be incentivized by the State.

2. DOER should not recommend that the State enter into long-term contracts with companies such as FirstLight to buy pumped storage from facilities such as the Northfield facility. We appreciate that FirstLight will want such long-term contracts as they would provide guaranteed income for the company to significantly ramp up its Northfield pumping and generation operations. However, as noted above, a significant increase in Northfield's operations would dramatically increase the

ecosystem damage this facility causes to the Connecticut River. Moreover, it would mean that FirstLight and the electricity it generates from Northfield would enjoy preferential treatment in the marketplace, as the company would no longer be required to compete on the open market with other providers of electricity. There is no guarantee that this would economically benefit consumers in the short or long term.

3. DOER should not revise the State’s clean peak standard in ways that enable hydropower facilities such as Northfield to claim new storage energy credits. We understand why FirstLight would want this, as FirstLight has applied in its license to significantly increase the size of its upper reservoir and clean peak revenue could provide the company with more money. But again, this would incentivize increased pumping and generation operations resulting in significantly more damage to the Connecticut River ecosystem. Moreover, Northfield’s pumped storage is produced through the use of Grid energy which is still predominantly generated by fossil fuels, unlike battery storage paired with and powered by renewables, so Northfield’s storage should not be incentivized for this reason.

4. Instead, DOER should create financial incentives for innovative mechanisms for reducing peak energy demand, in the form of new demand response programs and technologies, as well as innovative storage technologies. DOER should not incentivize expansion of industrial hydropower facilities such as Northfield. The true “cost” of facilities such as Northfield is far too high!

Many Massachusetts citizens and groups are participating in the FERC relicensing of FirstLight’s facilities and are increasingly troubled by the failure of FirstLight to adequately address their wide-ranging and legitimate concerns about the extensive damage caused by these facilities. We recognize that the challenges of a warming climate are very real and must be addressed, however, we must not attempt to meet these challenges through the wanton destruction of our natural resources.

Sincerely,

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Pearl Burgoff	Northampton
Lundy Bancroft	Northampton
Livia Charles	Northampton
Julian Burgoff	Amherst
Sarah Matthews	Amherst
Becca Matthews	Amherst
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Sophia Sharp	Amherst
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Shauna Lynn	Greenfield
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Sharin Alpert	Buckland
Dorothea Sotiros	Greenfield
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Beth Fairservis	Williamsburg
Stephen Katz	Williamsburg
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