



VIA EMAIL ONLY (peter.ray@mass.gov)

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

August 7, 2020

Dear Secretary Marini,

The Cape Cod Climate Change Collaborative (Climate Collaborative) is writing in response to the request from the Department of Public Utilities (the Department) for written comments on the petition of the Cape Light Compact JPE (the "Compact") for approval of a compliance filing in D.P.U. 20-40, regarding implementation of the Cape and Vineyard Electrification Offering ("CVEO"). The Climate Collaborative strongly supports CVEO both because of the impact the offering will have on the reduction of greenhouse gas emissions and because of its focus on low and moderate income residents.

Established in 2016, the mission of the Climate Collaborative is to reach carbon neutrality--or net zero--on Cape Cod and the Islands by enhancing communication, collaboration, and activism among organizations, programs and individuals committed to mitigating the climate crisis.

CVEO is an innovative proposal from the Compact that will deliver cost-effective energy savings and greenhouse gas emissions reductions. The offering does this by replacing a customer's fossil fuel-based or electric resistance heating system with a cold climate heat pump that uses electricity for both space heating and cooling. With this package the electricity usage of the heat pump will be offset by the installation of a solar PV system that produces renewable electricity on site, which will avoid adding new load to the electric grid. In addition, a battery storage system will be installed as part of CVEO. This storage will help save all ratepayers money because it will be used by the Compact to reduce the region's peak demand. It will also provide a source of backup power for the CVEO participant in the event of an electricity outage.

The Climate Collaborative is especially concerned that the transition to a clean energy future take place equitably across all income and cultural groups. This CVEO addresses equity head-on with its focus on serving low- and moderate- income customers. While solar PV systems and heat pumps will ultimately provide financial savings to customers, low- and

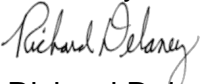
moderate- income residents may not have the means to afford the high upfront cost of these technologies and are often unable to qualify for loans or other financing to install these measures. This offering is designed to mitigate those inequities.

The Climate Collaborative is also pleased to see that the technology portfolio of CVEO is clearly aligned with recent changes to the Green Communities Act of 2008. These changes expand the permissible scope of energy efficiency plans to include strategic electrification, energy storage and other active demand technologies and programs that lead directly to customers of renewable energy sources.

We note that the Compact's proposal, as set forth in the petition and supporting documentation, is likely to lessen the economic burden of the overall offering on energy efficiency ratepayers in general. This reduction of impact would be accomplished by utilizing a third-party ownership structure for the solar PV and battery storage technologies. This third-party ownership structure will leverage outside incentive funding, and by so doing will offset the impact of the offering on the average ratepayer.

For these reasons, the Cape Cod Climate Change Collaborative endorses this petition by the Cape Light Compact with enthusiasm, and respectfully requests that the Department grant it approval.

Sincerely,



Richard Delaney, President
Cape Cod Climate Change Collaborative

cc: Sarah Smegal, Hearing Officer (sarah.smegal@mass.gov) Jeffrey M. Bernstein, Esq. (jbernstein@bck.com) Audrey A. Eidelman, Esq. (aeidelman@bck.com)