

July 25, 2024

Senator Michael Barrett, Chair Joint Committee on Telecommunications, Utilities, and Energy State House, Room 109-D Boston, MA 02133

Senator Cynthia Creem, Majority Leader Massachusetts Senate State House, Room 312-A Boston, MA 02133

Senator Bruce Tarr, Minority Leader Massachusetts Senate State House, Room 308 Boston, MA 02133 Representative Jeffrey Roy, Chair Joint Committee on Telecommunications, Utilities, and Energy State House, Room 43 Boston, MA 02133

Representative Richard Haggerty, Vice Chair Joint Committee on Telecommunications, Utilities, and Energy State House, Room 26 Boston, MA 02133

Representative Brad Jones, Minority Leader Massachusetts House of Representatives State House, Room 124 Boston, MA 02133

Dear Conference Committee Members,

On behalf of the Greater Boston Chamber of Commerce and our 1,200 members, I write to offer comments on S.2838/H.4884, bills that facilitate the deployment of renewable energy generation and supporting electric grid infrastructure upgrades. We appreciate that both the House and Senate recognize the importance of a streamlined and predictable permitting process to confront the large endeavor of upgrading our electric distribution system to meet our ambitious climate goals. These investments are critical to accommodate a large influx of renewable energy and other distributed generating resources. The Chamber reiterates, however, that the transition to cleaner forms of energy significantly impacts employers and residents, and the practical impacts of sudden policy changes, without sufficient study, adequate time for transition, or thorough evaluation of practical impacts, can hurt our state's competitiveness, electric grid reliability, and energy security. Therefore, the Chamber urges the conference committee to pursue a legislative agreement on common approaches to siting and permitting reform before July 31, while leaving divergent policy approaches on other issues such as the bottle deposit law, long-term renewable energy contracting, metering, and the role of natural gas, to future debate.

Siting and Permitting Reform

The Chamber supports the Commonwealth's goal of achieving net-zero emissions by 2050. To achieve that goal, our energy sources and electric distribution system must undergo a fundamental transformation – a transition that will take decades to fully implement. By 2050, our grid will need to accommodate double the electric demand of today. While handling this vast increase in electric load alone presents a big infrastructure challenge, our distribution systems must also become nimble and flexible. The utility grid must provide reliable power in new areas of the state that increasingly rely on electrification, deploy energy storage, handle dramatic increases in distributed generation, and charge electric vehicles. These are a few of the many technological and infrastructure considerations part of the future grid evolution.

The Chamber appreciates the work of the Healey Administration's Commission on Energy Infrastructure and Siting and Permitting and applauds the Legislature for adopting many of its recommendations. As you know, navigating the complex permitting process to deploy new renewable energy generating systems, and their related electric grid upgrades, is cumbersome and significantly slows down or prevents



Q

¹ "The Future of Electric Networks in Massachusetts" National Grid, January 2024



the deployment of these necessary projects. Both S.2838 and H.4884 provide a predictable process, with sufficient local community input and protections for environmental justice communities, for project developers and their utility partners to receive the necessary review and approvals to deploy clean energy. The bills provide a transparent pathway for both small and large clean energy generation facilities, transmission facilities, and distribution infrastructure facilities, Importantly, the bills create a comprehensive local permitting process, constructive approval after 12 or 15 months, and an expedited appeals process to resolve any outstanding legal challenges. These provisions are critical to expediting necessary clean energy projects and achieving emissions reductions.

Electric Grid Reliability and Affordability

Foundationally, to ensure both grid reliability and reduced emissions over the long-term, there will need to be sufficient clean power available, and the appropriate infrastructure to deliver it to our homes and businesses, before the Commonwealth can eliminate other sources of electricity and heat we rely on today. Building the capacity of our renewable energy systems and grid is an appropriate goal, and the siting and permitting reforms in S.2838 and H.4884 will expedite the clean energy transition. We caution the conference committee, however, that the other forms of electricity and heat our communities rely on today are still needed for the time being - including our natural gas infrastructure. Disruptions to energy supply and lack of access to reliable sources energy, such as natural gas, can have tremendous negative impacts to living and working in Massachusetts.

The Commonwealth is already home to some of the highest energy prices in the United States. While experiencing growth, delays in offshore wind power, hydropower, and disruptions in the solar power market continue to impede progress in diversifying our energy sources. We encourage the Conference Committee to avoid policies that impede access to current reliable sources of energy while these clean energy systems continue to expand.

Long-Term Contracting

The Chamber supports the Legislature's previous authorizations of long-term, competitively bid, contracting processes for renewable energy sources, with particular support for offshore wind generation resources. However, with a large amount of contracting capacity already authorized by statute and yet to be awarded to project proponents, the Chamber believes there is no need to expand this authority by a wholesale, unrestricted grant of contracting power to the Department of Energy Resources under the Senate legislation, or a new contracting authorization under the House bill. We also believe that our electric distribution companies are an essential part of the contracting process and provide valuable technical expertise and ratepayer protection, and should continue to partner with the Administration in the long-term contracting process.

I thank you in advance for your consideration. Please feel free to reach out with any questions.

Sincerely,

James E. Rooney President & CEO

James E. Rovery