***VIA EMAIL ONLY (***[***peter.ray@mass.gov***](mailto:peter.ray@mass.gov)***)***

Mark D. Marini, Secretary

Department of Public Utilities

One South Station, 5th Floor

Boston, MA 02110

Dear Secretary Marini,

[Name of entity] is writing in response to the request from the Department of Public Utilities (“DPU” or 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”). For the reasons set forth herein, [name of entity] strongly supports CVEO.

CVEO is an innovative proposal from the Compact that will deliver cost-effective energy savings and greenhouse gas emissions reductions. The offering will replace a customer’s fossil fuel-based or electric resistance heating system with a cold climate heat pump that uses electricity for space heating and cooling. 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. Lastly, a battery storage system will be installed as part of CVEO to help save all ratepayers money as it will be used by the Compact to reduce the region’s peak demand and will provide a source of backup power for the CVEO participant in the event of an electricity outage.

CVEO will deliver a much-needed focus on serving low- and moderate- income customers. These customer groups currently install the CVEO technologies at low rates in comparison to other customers. That is because while solar PV systems and heat pumps ultimately provide savings to customers, low- and moderate- income customers do 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.

[to add if of interest to the author] [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 result in customers switching to renewable energy sources or other clean energy technologies.]

[to add if of interest to the author] [Moreover, the Compact’s proposal set forth in the petition and supporting documentation will undoubtedly lessen the economic burden of the overall offering on energy efficiency ratepayers 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 to offset the overall ratepayer impact of the offering.]

For all of these reasons, [Name of entity] respectfully requests that the Department approve the Compact’s petition.

Sincerely,

[Name of entity]

cc: Sarah Smegal, Hearing Officer ([sarah.smegal@mass.gov](mailto:sarah.smegal@mass.gov))

Jeffrey M. Bernstein, Esq. ([jbernstein@bck.com](mailto:jbernstein@bck.com))

Audrey A. Eidelman, Esq. ([aeidelman@bck.com](mailto:aeidelman@bck.com))