



October 28, 2022

FIRSTLIGHT POWER COMMENTS IN RESPONSE TO THE NEW ENGLAND STATES' TRANSMISSION INITIATIVE NOTICE OF REQUEST FOR INFORMATION and SCOPING MEETING

Company Overview

FirstLight is a leading clean power producer and energy storage company with operating and development assets in New England, Pennsylvania, New Jersey, and New York. Our operating portfolio includes nearly 1.4GW of pumped-hydro storage, battery storage, hydroelectric generation, and solar generation—the largest clean energy generation portfolio operating in New England today. Our mission and vision is to accelerate the decarbonization of the electric grid by owning, operating, and integrating large-scale renewable energy and storage assets to meet the region's growing clean energy needs and to deliver an electric system that is clean, reliable, affordable, and equitable.

FirstLight's hydropower facilities in New England produce over 690,000 MWh of emissions-free generation, reducing the region's carbon footprint by more than 780,000 tons annually. In addition to our conventional and run-of-river hydro facilities, we also own and operate the 1168 MW Northfield Mountain pumped hydro storage station and 28 MW Rocky River pumped hydro storage station, respectively the largest and third largest energy storage facilities in New England, 2 MW of solar PV, and 1.5 MW of behind-the-meter battery storage in Massachusetts. Our facilities represent over a billion dollars of private investment in the region, employ 130 people, and support our communities in Massachusetts with more than \$15 million in local property taxes every year.

Comments

FirstLight Power, Inc. ("FirstLight") supports the five states' Regional Transmission Initiative and its September 1, 2022 Notice of Request for Information and Scoping Meeting to seek comment "regarding changes and upgrades to the regional electric transmission system needed to integrate renewable energy sources." In order for the New England states to meet their clean energy objectives, FirstLight recognizes this requires reliable and efficient integration of the

region's renewable resources. FirstLight believes that reliable and efficient integration requires three elements: (i) cost effective, reliable interconnection of the renewable energy sources to the grid, (ii) sufficient grid transmission upgrades to achieve reliable and efficient delivery from the point of interconnection to load centers, and (iii) effective use of electric storage (new and existing) to transport clean energy to the hours of greatest value to cost effectively achieve state policy goals.

While the instant Notice of Request for Information and Scoping Meeting seem to be focused on the first two of those categories, we offer these brief comments to encourage the five participating states of Connecticut, Massachusetts, New Hampshire and Rhode Island (collectively, the "Participating States") to consider an additional phase of effort to address the third category. It is clear that effective use of both new and existing electric storage facilities will be needed to cost effectively integrate the significant increases in renewable generating resources targeted by the Participating States clean energy plans. FirstLight has two large and two smaller electric storage facilities and we have further plans to expand our electric storage capabilities. FirstLight's two largest facilities are the Northfield Pumped Storage Facility, an approximately 1,168MW facility capable of holding an approximately 7.5hour charge located in Massachusetts, and the Rocky River Pumped Storage Facility, an approximately 28MW electric storage resource capable of holding a charge duration of multiple days. While these resources today deliver valuable charge and discharge services under the ISO New England wholesale market signals, those signals do not capture the full synergies with the new and coming renewable energy resources that are possible through paired operation (which does not require collocation).

Electric system related carbon emissions vary throughout each day based on the mix of resources available for dispatch, the system electric demand and the uncertainty in both. Existing large grid-connected electric storage facilities are ideal facilities to achieve optimal clean energy use in light of system supply and demand uncertainties. Optimizing clean energy deployment across hours can reduce the use of power plants with the highest emissions leveraging the deployment of the clean generation by doing what wind and solar resources alone cannot achieve – scheduling the delivery of that energy in the hours of greatest impact on emissions and consumer costs.

FirstLight is hopeful that the Participating States will consider this request to supplement their pursuit of regional electric transmission changes and upgrades with a subsequent effort to pursue improved electric storage use to complete the desired integration of renewable energy resources.

Respectfully,
Len Greene
Head of External Affairs
FirstLight Power, Inc.