



My Generation Energy  
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July 24th, 2013

*Via Electronic Mail*

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

RE: Modernization of the Electric Grid Comments D.P.U. 12-76

Investigation by the Department of Public Utilities on its own Motion  
into Modernization of the Electric Grid.

Dear Secretary Mark Marini:

My Generation Energy, Inc. submits these comments following the Department of Public Utilities July 10th notice for comment on the report to the Department of Public Utilities from the Steering Committee regarding modernization of the electric grid in D.P.U. 12-76.

Thank you for your attention to this matter and please do not hesitate to contact me should you have any questions or comments.

Sincerely,  
/s/ Michael Stone  
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## **My Generation Energy Company Background**

In 2008 My Generation Energy was formed as a solar installation and development company with one employee completing the installation of 8 panels on his home in Brewster, MA. Since then our company has installed over 15,000 solar panels and employs a number of professionals performing a range of diverse work that is highly localized and that will never be outsourced.

Our success story is shared with that of over 200 companies in the state involved in solar installation within a clean energy industry now employing over 70,000 according to the 2012 Massachusetts Clean Energy Industry Report. Of this industry, installation and maintenance represents the 'largest value chain activity by number of firms.' These companies do good work doing well for the communities they serve. The systems they install, such as solar photovoltaic systems, provide consumer choice and savings, diversify the state's energy resources, reduce peak demand as well as reduce unnecessary transmission expenditures.

## **My Generation Energy Comments on the Steering Committee Report**

My Generation Energy appreciates the Department of Public Utilities ("Department") order opening an investigation into Modernization of the Electric Grid. We believe that there are significant benefits to modernizing the grid as many transformative technologies have been proven commercially and can lead to a distribution system that is more responsive to customers, more responsive to price signals, that offers energy supply savings opportunities, and that is best prepared for the effects - and increasing costs - of climate change. For these reasons My Generation Energy strongly supports the Department's investigation in this docket and appreciates the opportunity to provide these comments.

## **My Generation Energy Supports A Proceeding on Time-Varying Rates**

We believe a separate proceeding on time-varying rates should be commenced as dynamic pricing and improved on-site energy usage information can facilitate greater consumer choice while allowing more market participants to reduce expensive peak demand and unnecessary transmission expenditures - costs that are shared by all ratepayers -. Even as pilot studies in this regulatory area of rates are underway we should not be myopic and delay a strong consideration of rate structures that can drive customer and system-wide savings, fully recognizing that many jurisdictions are already using time-varying rates effectively. Therefore we

commend the Steering Committee on their work thus far and encourage the Department to further explore the best available options to the Commonwealth.

### **My Generation Energy Supports a Targeted Electric Vehicle Proceeding**

My Generation Energy believes that the rapidly growing market of electric vehicles presents significant opportunities to the Commonwealth yet also brings to light the lack of a consistent policy and regulatory framework to accommodate this transportation option. These vehicles can significantly reduce the economic and environmental costs of fossil fuels, can flatten the load curve by optimizing off-peak generation, have the potential to improve the reliability of the grid and - the largest driver - are increasingly what consumers are seeking. According to Pike Research, "Sales of plug-in electric vehicles will grow at a compound annual growth rate of nearly 40% over the remainder of the decade, while the overall auto market will expand by only two percent a year." Electric vehicles sales in 2012 alone impressively tripled from the prior year according to Green Car Reports. Considering the potential positive impact to the electric grid and the Commonwealth as a whole in meeting its clean energy goals we believe the Department should provide greater certainty to all market participants by opening a separate proceeding on this matter to explore challenges and opportunities for electric vehicle adoption while working to identify and remove regulatory barriers.

### **My Generation Energy Supports Prudent Investments that Will Mitigate Climate Change and Reduce Impacts on Local Communities**

The costs of inaction on climate change are increasing: Hurricane Sandy cost well over \$50 billion<sup>1</sup> based on multiple reports, Hurricane Katrina cost over \$113 billion<sup>2</sup> and costs will continue to grow as the planet warms, sea levels rise, and as all communities - especially coastal communities - become more vulnerable. As a simple case study utilities like Entergy which serves electricity customers in Louisiana has:

"realized that climate change threaten[s] not just the company's infrastructure but its customer base...five months after the storm, Entergy had fewer than 500,000 customers in Louisiana, a 40 percent

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<sup>1</sup> [http://www.cbsnews.com/8301-201\\_162-57543923/damage-from-sandy-could-cost-as-much-as-\\$50b-says-forecasting-firm/](http://www.cbsnews.com/8301-201_162-57543923/damage-from-sandy-could-cost-as-much-as-$50b-says-forecasting-firm/)

<sup>2</sup> <http://www.economist.com/blogs/freeexchange/2012/10/hurricane-sandy>

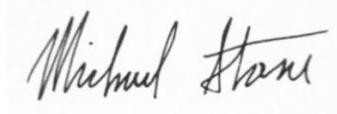
drop. 'We had tremendous damage to our system, and yet no revenue coming in to pay for repairing it.'"<sup>3</sup>

Examples like these fully demonstrate that in the interest of the Commonwealth, for utilities, ratepayers, businesses and citizens alike, it is sensible to harden infrastructure where appropriate to avoid business disruptions, avoid relocations and avoid the significant strain on services and on the overall economy these events place on communities. A system more resilient to storms will additionally improve reliability and better match long-term planning horizons.

### **Conclusion**

In closing we believe that these recommendations are consistent with the Global Warming Solutions Act and consistent with the Department's charge to provide safe and reliable electricity. Thank you for the opportunity to provide these comments as we appreciate your attention to this important matter for the Commonwealth as we look forward to participating in this proceeding and any subsequent proceedings.

Very truly yours,



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<sup>3</sup> <http://www.businessweek.com/articles/2012-10-04/in-new-orleans-entergy-prepares-for-the-next-big-one>