



SMART GROWTH AND REGIONAL COLLABORATION

**Comments on 225 CMR: Department of Energy Resources  
Submitted by: Metropolitan Area Planning Council (MAPC)  
October 30, 2015**

The Metropolitan Area Planning Council (MAPC) would like to submit the following comments regarding the Department of Energy Resources (DOER)'s regulations, 225 CMR, in response to Governor Baker's Executive Order 562.

**Background**

A regional planning agency, MAPC has been working successfully with cities and towns, both individually and collectively, for years to provide a range of clean energy services, from comprehensive local energy and climate planning and energy-related technical assistance to regional energy procurements. MAPC's region – the 101 cities and towns of Metro Boston – accounts for nearly half of the Commonwealth's energy consumption and greenhouse gas (GHG) emissions. The success of our initial work has led not only to demand to replicate projects in more municipalities in our region, but also to significant interest from across the Commonwealth to participate in our energy projects and programs. The goal of MAPC's Clean Energy Division is to advance markets for clean technology while reducing greenhouse gas emissions and dependence on fossil fuel consumption in the Commonwealth.

**Comments**

**DOER's suite of regulations within 225 CMR has provided tremendous support to our efforts.** These regulations have served as the enabling mechanism, in many cases, to advance clean energy and GHG reductions in our municipalities.

- **Energy Management Services:** The turnkey performance contracting vehicle for municipal energy efficiency and onsite generation procurement operationalized in 225 CMR 10.00 and 19.00 has enabled cities and towns to accelerate their deployment of clean energy. By using M.G.L. c. 25A, § 11C and § 11I to facilitate collective procurements for over 50 cities and towns, MAPC has been effective in supporting the Commonwealth's GWSA and GCA goals and reducing costs. MAPC's LED streetlight and ESCO collective procurements are expected to save 11.9 million kWh annually and reduce GHG emissions by 12 million pounds annually, and our collective solar procurement has the potential to result in over 15 MW of new generation, resulting in GHG reductions of 36 million pounds annually. Communities will save millions of dollars over the lifetime of these projects. We encourage the state to continue providing clear guidance and improvements to these regulations, while also clarifying and expanding that guidance to allow these mechanisms to enable, expedite, and bring greater access to energy storage projects for public entities.
- **Energy Efficiency:** A number of regulations within 225 CMR are designed to enable and facilitate rigorous appliance standards and energy conservation programs, including in state facilities, the residential sector, municipalities, and housing authorities, among others. These programs should continue to be encouraged, promoted, and funded. DOER has long referred to energy efficiency

as the Commonwealth's "first fuel,"<sup>1</sup> and recognized it as the least expensive pathway to reduced energy consumption and costs in the state. The GWSA Clean Energy and Climate Plan continues to depend on both efficiency programs and appliance standards to advances its strategies.

- **Renewable and Alternative Portfolio Standards:** The RPS and APS standards enable the Commonwealth to maintain its leadership in the nation in exceeding federal clean energy goals and promoting clean energy as part of electricity and thermal supplies. As the RPS is a statutory obligation that requires suppliers to obtain a percentage of electricity from RPS Class I sources for their retail customers, a percentage that grows annually by 1% and now stands at 10%, MAPC has been able to leverage that standard to encourage cities and towns participating in green municipal aggregation programs to contract for supply that exceeds that RPS baseline by 50% or more. We encourage the state to build on its progress with the RPS, taking the lead from its cities and towns, and consider augmenting the RPS annual percentage increase in the future, while also finalizing the addition of renewable thermal to the APS.
- **National Leadership:** Regulations such as those that establish rules for the state's participation in RGGI – 225 CMR 13.00 – and the EMS and RPS regulations described above advance and cement Massachusetts' leadership in the nation on clean energy. Recognition by ACEEE, for example, as the #1 ranking state in energy efficiency attests to the leadership status that the Commonwealth has worked hard to garner and should work just as hard to preserve.

**In sum, the suite of DOER regulations has helped cities and towns to save money, shift the market, and take bold action.** 225 CMR has largely made economic and environmental sense for the Commonwealth, allowing cities and towns to benefit from, contribute to, and serve as leaders in energy efficiency, climate change mitigation, and the burgeoning clean energy economy.

Please contact Cammy Peterson, Manager of Clean Energy, at [cpeterson@mapc.org](mailto:cpeterson@mapc.org) or 617-933-0791 with any questions on these comments.

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<sup>1</sup> <http://www.mass.gov/eea/docs/doer/energy-efficiency/ee-story-booklet-web.pdf>