



December 4, 2020

Ms. Samantha Meserve
Deputy Director, Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge Street, 10th Floor
Boston, MA

Subject: Saint-Gobain Abrasives Comments on APS

Dear Ms. Meserve,

The purpose of this letter is for Saint-Gobain Abrasives (SGA) to provide comments on the Alternative Energy Portfolio Standard (APS) review being conducted by the Massachusetts Department of Energy Resources (DOER).

We appreciate the opportunity to provide input during this important process.

BACKGROUND

Saint-Gobain Abrasives is a leading supplier for bonded, coated, non-woven and super-abrasives, as well as diamond and equipment products for the industrial, construction, automotive repair and do-it-yourself markets. Formerly known as Norton Abrasives, we have called Worcester home for more than 130 years and the world headquarters for the Abrasives business remains in Worcester, where we employ over 1,000 employees on the Worcester Campus.

We have continued to invest in our business in Worcester and, to this end, we recently made the decision to invest in a new Powerhouse which includes a new 4.6 MW gas turbine, new boilers, and related equipment. The new CHP will replace our old, inefficient power plant, lower GHG emissions, and enhance reliability. The engineering is nearly complete and we expect to break ground in early January 2021. It is expected that the new system will come online in Q1 2022.

The new Powerhouse will help us to stay competitive in the North America market. This is critical to retaining high-quality manufacturing jobs in a part of the Commonwealth that is economically challenged.

We therefore strongly urge the DOER to continue to support CHP's inclusion in the program, as well as strengthen the APS moving forward.



DISCUSSION

Resiliency

The CCHP system that is currently being installed will have the ability to blackstart and island. This will enhance our ability to continue to operate in the event of a sustained utility outage, most likely caused by the increasing incidence of extreme weather like hurricanes, tornadoes, and ice storms.

GHG Reductions

As stated previously, SGA currently generates its own power and steam via an existing powerhouse that has been in place for a number of decades. The new Powerhouse will be considerably more efficient than the existing Powerhouse; it is expected that natural gas usage will be cut roughly in half.

In conclusion, the Commonwealth has done a good job of encouraging energy efficiency projects through vehicles like the APS, and SGA has responded to that by making very significant investments in our energy infrastructure in Worcester so we can continue to support well-paying jobs in Central Massachusetts. AECs were a major part of the decision to make these investments and it would be very disappointing if the rules were changed in the middle of the game. We therefore urge the DOER to allow CHP to remain part of a strengthened program moving forward.

We are available should you have any questions and we appreciate your time and attention on this matter.

Sincerely,

Patrick Redington

General Manager, Bonded Abrasives and Superabrasives
Saint-Gobain Abrasives North America