

December 4, 2020

Ms. Samantha Meserve

Via e-mail - DOER.APS@mass.gov

Deputy Director, Renewable and Alternative Energy Division

Massachusetts Department of Energy Resources

100 Cambridge Street, 10th Floor

Boston, MA

Subject: MACOM Technology Solutions Inc. Comments on APS

Dear Ms. Meserve,

The purpose of this letter is for MACOM 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.

MACOM Technology Solutions Inc designs and manufactures analog radio frequency (RF), microwave, millimeter wave, and photonic semiconductor solutions. Our headquarters and primary manufacturing facility are based in Lowell, MA, where we employ over 400 employees. Our high technology semiconductor manufacturing processes in Lowell, use sophisticated equipment in class 10,000 clean rooms are energy intensive, and extremely sensitive to power disruptions.

It is MACOM's position that Combined Heating and Power (CHP) should continue to be a part of the APS program, and alternative energy certificates should not be phased out as suggested in the APS review completed by Daymark Energy Advisors. To this end, MACOM recently executed a Power Purchase Agreement (PPA) with Renew Energy Partners (Renew), a Massachusetts based entity, for a 2.65 MW reciprocating engine, 630 kW / 1500 kWh battery storage system, 190-ton chiller, and related equipment. The engineering is nearly complete and we expect to break ground in early January 2021 with the system coming online later in 2021. This project would not have been economically viable without the benefit of the APS and alternative energy certificates (AECs).

In addition to providing power resiliency and carbon emission reductions, the new CHP and its associated systems are expected to provide valuable savings, helping MACOM to be competitive while also providing construction, manufacturing and technology related jobs in a part of the Commonwealth that is economically challenged. In determining whether to move forward on the project, the AECs were a very important part of the decision. Our expectations are to utilize the savings from the CHP project including those derived from AECs to fund further investment in technology and development of our Lowell operations.

We feel the Daymark study dramatically underestimated the capital and operating costs of a CHP system and would be happy to provide further detail if needed.

We therefore strongly urge the DOER to continue to support CHP's inclusion in the program, as well as strengthen the APS moving forward. We are available should you have any questions, and we appreciate your time and attention on this matter.

Sincerely,

A handwritten signature in blue ink, reading "Jack Kober". The signature is fluid and cursive, with the first name "Jack" and last name "Kober" clearly distinguishable.

Jack Kober
MACOM SVP & CFO
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