



Ms. Samantha Meserve  
Deputy Director, Renewable and Alternative Energy Division  
Massachusetts Department of Energy Resource  
100 Cambridge St #1020  
Boston, MA 02114

December 4, 2020

RE: The Massachusetts Department of Energy Resource (DOER) 2020 Alternative Energy Portfolio Standard (APS) Minimum Standard Review

The Combined Heat and Power Alliance (CHP Alliance) respectfully submits the following on behalf of Sterling Energy Group LLC in response to the 2020 APS Minimum Standard Review per 225 CMR 16.07(3). The Massachusetts DOER has solicited comments to several stakeholder questions. To assist in the APS review, DOER hired an independent consultant, Daymark Energy, LLC, to undertake an assessment of the APS program.

The CHP Alliance is a diverse coalition and the leading national voice for the deployment of Combined Heat and Power (CHP). We are a coalition of business, labor, contractor, non-profit organizations, and educational institutions with the common purpose to educate all about CHP, and how CHP can make manufacturers and other businesses more competitive, reduce energy costs, enhance grid and customer reliability, and reduce emissions.

The CHP Alliance fully endorses the comments submitted by the Northeast Clean Heat and Power Initiative (NECHPI)—attached to this document—which states there are several assertions in the Daymark Energy APS Review that are highly controversial and urges the DOER to revisit the empirical basis for the following claims:

- that there are no CO<sub>2</sub> savings from CHP;
- the capital costs of CHP systems assumed by the Daymark report;
- the Operations and Maintenance costs of CHP systems assumed in the report;
- the expected years to payback assumed in the report;
- the level of incentive that the CHP systems would receive from other (Non-APS) programs, that assumed in the report, and to provide a more comprehensive picture; and
- list the full suite of environmental, societal, ratepayer, jobs and economic development benefits provided by CHP vis-à-vis other qualifying APS technologies

The CHP Alliance fundamentally disagrees with the Daymark Energy study claims that CHP offers no CO<sub>2</sub> reductions, and urges the DOER to specifically refer to items in the appendix of NECHPI comments supporting the benefits of CHP:

- A list of CHP site testimonials that have brought proven benefits to the State of Massachusetts and value the support the State has given them in their installation and operation of CHP; and,
- A slide presentation commenting on the analysis conducted by Daymark that concluded natural gas CHP provides no CO<sub>2</sub> reductions.

Lastly, the CHP Alliance urges the DOER to refer to our [Smart Solutions to Reduce Greenhouse Gas Emissions Factsheet](#), which outlines the significant opportunity to reduce emissions using CHP technologies.

Respectfully,

**Ken Duvall**

Managing Partner / Chief Executive Officer  
Sterling Energy Group LLC