

**2020 APS Minimum Standard Review Stakeholder Questions**  
**November 5, 2020**

Per 225 CMR 16.07(3) the Massachusetts Department of Energy Resources (“DOER”) is required to complete a review of 225 CMR 16.00 Alternative Energy Portfolio Standard (“APS”), including a public comment period, no later than December 31, 2020. The review must include, but is not limited to, an examination of the costs and benefits of the program to ratepayers, an examination of the effectiveness of the program in meeting the energy and environmental goals of the Commonwealth, and an evaluation of whether the Minimum Standard or its rate of increase, as established in 225 CMR 16.07(2), should be adjusted. DOER has taken initial steps to conduct this review by commissioning an independent analysis and report of the APS program completed by Daymark Energy, LLC (“Daymark Report”). In order to supplement the information from the Daymark Report, DOER is opening a public comment period as part of its 2020 APS Minimum Standard Review to seek feedback from stakeholders on the following questions:

1. What are the benefits of the APS program to ratepayers, including but not limited to economic, environmental, and societal benefits?
2. What are the costs of the APS program to ratepayers, including but not limited to economic, environmental, and societal costs?
3. Do you believe the APS program should prioritize technologies which provide the most benefits, such as greatest greenhouse gas emissions reductions?
4. From 2015 through the present, what have been the average quarterly Alternative Energy Certificates (AEC) sale prices?
5. Is the current APS minimum standard and the annual rate of increase adequate? Please include details and any data supporting why or why not, where possible.
6. Do you anticipate a growth or decline in the supply of AECs in the APS program over the next 5 years? 10 years? If so, how would you quantify this increase in growth rate? Please include details and any data supporting your conclusions.
7. Are there modifications to the APS program that could be made to reduce the volatility of the APS market?
8. Has the APS incentive had an impact on the decision of system owners to invest in APS eligible technologies? Why or why not.
9. How could the APS program be improved to better influence residential or commercial purchasing behaviors?
10. Are there currently eligibility criteria in the APS program that you believe are a barrier to participation in the program? How would you address these barriers?
11. What revisions to the existing APS eligibility criteria would you propose to improve and simplify the APS program, if any?
12. Is there any additional information you believe DOER should consider in its 2020 APS Minimum Standard Review?

Responses to the above questions will be accepted until 5pm on December 4, 2020. Please send all responses to Samantha Meserve at [DOER.APS@mass.gov](mailto:DOER.APS@mass.gov) with the subject “2020 APS Minimum Standard Review Comment”.