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April 1, 2022

Mr. John Wassam  
Massachusetts Department of Energy Resources  
100 Cambridge St, Suite 1020  
Boston, MA 02114

RE: RPS Regulations Categories A and B

Dear Mr. Wassam,

The International District Energy Association (IDEA) is based in Westborough, MA and was founded in 1909. Today, IDEA represents over 2,500 members from more than 25 countries around the world and across the district energy industry. IDEA members own, operate, or provide technology and services to district energy systems that supply steam, hot water, chilled water and energy services to multiple buildings in cities, communities, campuses, airports, military bases, industry and healthcare facilities.

Among IDEA members are 14 major Massachusetts universities and energy providers that are actively engaged in Massachusetts' decarbonation roadmap – indeed, many of them are deploying systems and technologies to accelerate achievement of the Commonwealth's 2050 emissions goals. Many of those member systems supply mission-critical customers like healthcare, research and pharma who require highly reliable and resilient thermal and electricity services. Additionally, as evidenced at the flagship University of Massachusetts Amherst, the CHP/district energy system provides valuable balancing capacity and ancillary services to complement and leverage intermittent renewables.

I write with comments regarding the proposed Renewable Portfolio Standard (RPS) regulations, particularly Categories A and B, pertaining to the rule prohibiting woody biomass CHP systems from eligibility for the RPS if they are within 5 miles of an environmental justice committee. IDEA members are working towards rapid innovation across the energy sector, and we would urge the state to avoid from foreclosing options such as biomass and biogas fuel. Biogas-based heating is a central pillar of [Denmark's net-zero strategy](#), and [Finland](#) has led the market on high-efficiency wood-fueled combined heat and power (CHP). IDEA member organizations are developing high-efficiency CHP systems that may adapt to harness biogas and biomass to limit emissions while facilitating the transition away from reliance on natural gas without compromising reliability and resiliency.

The energy sector is in a phase of rapid transition, and above all our members value flexibility: to develop energy systems that best fill their needs and the needs of their local communities. By widely prohibiting the use of fuels such as biomass and biogas, the Commonwealth may inadvertently limit the innovative potential of some of its most prestigious partners at the heart of a vital segment of the economy. Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink, reading "Robert P. Thornton". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Robert P. Thornton, President & CEO