MassDEP GHG Reporting Program Summary Report For Retail Sellers of Electricity Emissions Year 2022 DECEMBER 2024

The information below summarizes the 2022 greenhouse gas (GHG) emissions and megawatt hours (MWh) of electricity sales in Massachusetts by the 104 retail sellers that sold electricity in Massachusetts during that year. Retail sellers of electricity in Massachusetts are required to report this information to the Massachusetts Department of Environmental Protection (MassDEP) under regulation 310 CMR 7.75.¹ MassDEP uses this information in considering measures to reduce emissions from the electric sector. This was the fourteenth² year of emissions reporting by retail sellers of electricity, and the fifth year of reporting under regulation 310 CMR 7.75. Data and comparisons from the first nine reporting years under 310 CMR 7.71 are provided in the summary reports for 2008 and 2010-2017.³ Changes to the regulation and the methodology for calculating emission factors make data from before 2018 not comparable with data since 2018; therefore, this summary only includes data beginning with 2018.

MassDEP requires retail sellers to report emissions that occur from the generation of the electricity that they sell. The GHGs emitted from power plants during combustion of fuels to generate electricity are carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). Biogenic and non-biogenic GHG emissions are reported separately. Biogenic GHG emissions are emissions of CO₂ that result from the combustion of biogenic (plant or animal) material, excluding fossil fuels. Non-biogenic GHG emissions include CO₂ released from the combustion of non-biogenic fuel, plus CH₄ and N₂O released from the combustion of any fuel.

The retail seller reporting process consists of 4 steps:

- Step 1. Unit-Specific Generation: Retail sellers report the use of MWh from unit-specific generation and any associated emissions.
- Step 2. Initial GHG Emission Factors: MassDEP develops initial GHG emission factors in terms of pounds of non-biogenic and biogenic GHGs in carbon dioxide equivalents per megawatt hour (lb CO₂e/MWh) based on all the electricity consumed in Massachusetts.
- Step 3. Final GHG Emission Factors: MassDEP develops final GHG emission factors for the electricity consumed in Massachusetts that was not reported in Step 1, by removing the MWh and emissions reported in Step 1 from the initial emission factors developed in Step 2.
- Step 4. GHG Emissions: Retail sellers report their GHG emissions by multiplying the final emission factors in Step 3 by their electricity sold and not reported in Step 1, and then adding emissions reported in Step 1.

¹ Additional information about MassDEP's GHG reporting program is available at

https://www.mass.gov/guides/massdep-greenhouse-gas-emissions-reporting-program; see particularly *Retail Seller* of *Electricity Reporting*.

² 2017 was the final reporting year under 310 CMR 7.71. Beginning with 2018 calendar year emissions, retail sellers began reporting under 310 CMR 7.75(9).

³ The summary reports may be found at: <u>https://www.mass.gov/lists/massachusetts-greenhouse-gas-ghg-reporting-program-data#retail-seller-ghg-emissions-reports-</u>.

This summary document reports data as calculated and/or corrected by MassDEP, and not necessarily as reported by retail sellers (as discussed further below).

Step 1: Unit-Specific Generation Reported by Retail Sellers

The purpose of reporting unit-specific generation is to assign to each retail seller the MWh and associated emissions from the unit-specific electricity claimed by each through ownership of the unit, contract for the power, or the purchase of certificates. Under 310 CMR 7.75, this report is mandatory for electric utilities and competitive suppliers and optional for municipal electric departments and light boards (MEDs).⁴ Table 1 shows the number of retail sellers reporting MWh from specific generating units from 2018 through 2022.

	Electric Utilities	Competitive Suppliers	Municipal Electric Departments	Total Retail Sellers
2018	all 3	62 of 65	all 40	105 of 108
2019	all 3	56 of 61	all 40	99 of 104
2020	all 3	60 of 61	all 40	103 of 104
2021	all 3	56 of 59	all 40	99 of 102
2022	all 3	57 of 61 ⁵	all 40	100 of 104

Table 1. Number of Retail Sellers Reporting MWh from Unit-Specific Generation

MWh and emissions from specific electricity generating units retired by electric utilities and competitive suppliers are reported through their annual 'Renewable Portfolio Standard/ Alternative Portfolio Standard/Clean Energy Standard (RPS/APS/CES) Workbook' to the Massachusetts Department of Energy Resources (DOER).^{6, 7} Retail sellers are then required to include these MWh and emissions in the mandatory GHG Emissions report. The reporting of MWh from specific electricity generating units by MEDs is still done through the submittal of an optional unit-specific generation report to MassDEP.

Figures 1 through 3 show the total retail sales and unit-specific generation by retail seller type for 2018 through 2022: Figure 1 shows the total retail sales; Figure 2 shows the total MWh from unit-specific generation; and Figure 3 shows the ratio of unit-specific generation to total retail sales. Figures 4 and 5 show the amount of emitting and non-emitting unit-specific generation retired by retail seller type for 2022 in MWh and as a percent of total. The increase in unit-specific generation in 2022 for electric utilities and competitive suppliers seen in Figures 2 and 3 is due to the first year of compliance with MassDEP's CES-E (clean existing generation) requirement.

⁴ In this document, Municipal Electric Departments and Municipal Light Boards are collectively referred to as municipal electric departments (MEDs).

⁵ Sixty-one competitive suppliers sold retail electricity in Massachusetts in 2022. Four competitive suppliers (Agera, Liberty, Mega, and Sunwave) failed to report their 2022 unit-specific generation. It is MassDEP's understanding that these competitive suppliers no longer operate in MA.

⁶ Certificates are required for compliance with DOER's Renewable Energy Portfolio Standard (RPS) <u>https://www.mass.gov/renewable-energy-portfolio-standard</u> and Alternative Energy Portfolio Standard (APS) <u>https://www.mass.gov/alternative-energy-portfolio-standard</u> programs, and MassDEP's Clean Energy Standard (CES) program <u>https://www.mass.gov/guides/clean-energy-standard-310-cmr-775</u>.

⁷ For more details on Step 1 of the GHG reporting process in Massachusetts, see <u>https://www.mass.gov/how-to/aq-31-32-retail-seller-of-electricity-greenhouse-gas-emissions-reporting</u>.

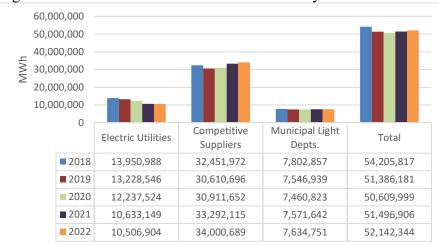
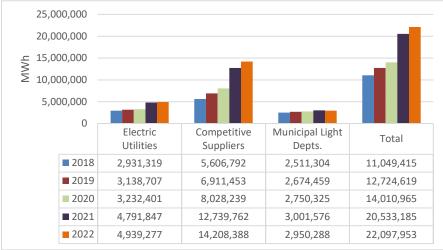
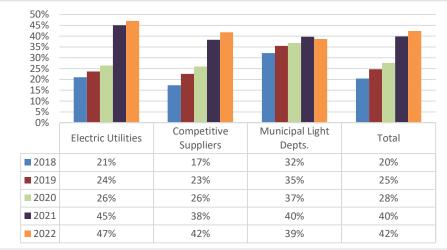


Figure 1. Total MWh of Retail Sales of Electricity

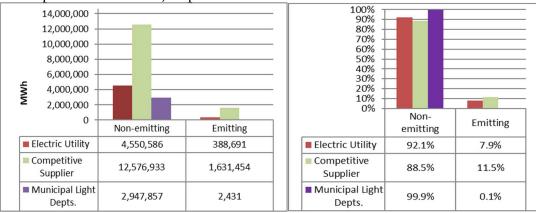
Figure 2. MWh reported from Unit-Specific Generation







Figures 4 and 5. Unit-Specific Non-emitting and Emitting Generation (as MWh and as Percent of Unit-Specific Generation) Reported for 2022



Details on the MWh reported by retail sellers from specific generating units can be found in Appendix 2A: *Optional Unit-Specific Generation Reported by MEDs for 2022* and Appendix 2B: *Unit-Specific Generation from GIS Certificates*⁸ *Reported by Electric Utilities and Competitive Suppliers for 2022*.

Steps 2 and 3: GHG Emission Factors

Table 2 shows the initial (Step 2) and final (Step 3) emission factors upon which retail seller GHG emissions are based. The combined non-biogenic and biogenic emission factors have been included in this summary report for informational purposes. (Please note that Table 2 presents wholesale emission factors. Consumers of electricity that want to use Massachusetts-specific emission factors to report their GHG emissions from electricity use should see Appendix 3: 2022 Retail Level Emission Factors for Use by Consumers of Electricity to Report Greenhouse Gas Emissions (Massachusetts-based Emission Factors) for appropriate values.)

For an explanation of the methodology used to calculate the initial emission factors, and of the "Massachusetts-based" and "Regional" approaches used to calculate the emission factors in Table 2, see *Draft 2022 Greenhouse Gas (GHG) Emission Factors to be used by Retail Sellers of Electricity Reporting under 310 CMR 7.75(9)(c) "Greenhouse Gas Emissions Reporting."*⁹

The RPS regulation requires electric utilities and competitive suppliers to retire certificates from emitting unit-specific generation, including municipal solid waste (MSW).¹⁰ Therefore, electric utilities and competitive suppliers are required to claim these certificates in their unit-specific generation reports. Because MSW emissions make up the major portion of biogenic emissions, particularly in Massachusetts, the result is a decrease from the initial biogenic emission factors to the final biogenic emission factors that are applied to non-unit-specific generation, as shown in Table 2.

⁸ Certificates are created and retired through the New England Power Pool Generation Information System (NEPOOL GIS). NEPOOL GIS "issues and tracks certificates for all MWh of generation and load produced in the ISO New England control area, as well as imported MWh from adjacent control areas." One certificate is generated for each MWh. See https://www.nepoolgis.com/.

⁹ <u>https://www.mass.gov/doc/technical-support-document-draft-2022-ghg-emission-factors/download</u>

¹⁰ Massachusetts retail sellers retired approximately 96% of the MWh generated in Massachusetts by MSW in 2022.

	Massachu	Massachusetts-based approach Regional approach						
	Non-Biogenic	Biogenic	Combined	Non-Biogenic	Biogenic	Combined		
Initial Emission Factor	ors: prior to acco	unting for unit-	-specific genera	ation (Step 2)				
2018	445	72	517	430	134	564		
2019	416	62	478	402	119	521		
2020	509	68	577	407	108	515		
2021	466	71	537	426	126	552		
2022	454	55	509	439	99	538		
Final Emission Facto	rs: after accountin	ng for unit-spe	cific generatior	n (Step 3)				
2018	486	18	504	445	118	563		
2019	468	8	476	421	104	525		
2020	605	2	607	431	87	518		
2021	634	15	650	478	117	595		
2022	637	0	637	499	85	584		

Table 2. GHG Emission Factors for Electricity Consumed in Massachusetts, prior to and after accounting for Unit-Specific Generation (lb CO₂e/MWh)

Step 4: GHG Emissions Reported by Retail Sellers

Most of the 104 retail sellers submitted their GHG emissions reports as shown in Table 3. This summary report reflects the MWh and GHG emissions data for all retail sellers that submitted their emission reports and includes data for the six competitive suppliers that failed to submit the unit-specific generation report or the GHG emissions report.

		Competitive	Municipal Electric	
	Electric Utilities	Suppliers	Departments	Total Retail Sellers
2018	all 3	58 of 65	all 40	101 of 108
2019	all 3	56 of 61	all 40	99 of 104
2020	all 3	58 of 61	all 40	101 of 104
2021	all 3	54 of 59	all 40	97 of 102
2022	all 3	55 of 61 ¹¹	all 40	98 of 104

Table 3. Number of Retail Sellers Reporting GHG Emissions

Figure 6 shows the total GHG emissions for the three types of retail sellers in 2022. Tables 4 and 5 show the corresponding values for Massachusetts-based and Regional-based non-biogenic and biogenic GHG emissions.

The information provided in Figures 3, 5 and 6 should not be used to draw comparisons between the three types of retail sellers because electric utilities and competitive suppliers are subject to two requirements that MEDs are not: 1. reporting all unit-specific electricity generation and 2. retiring MSW certificates, which causes electric utilities and competitive suppliers to have higher relative emissions than MEDs.

¹¹ Six competitive suppliers (Agera, Astral, Liberty, Mega, Starion and Sunwave) failed to report their 2022 GHG emissions. It is MassDEP's understanding that these competitive suppliers no longer operate in MA.

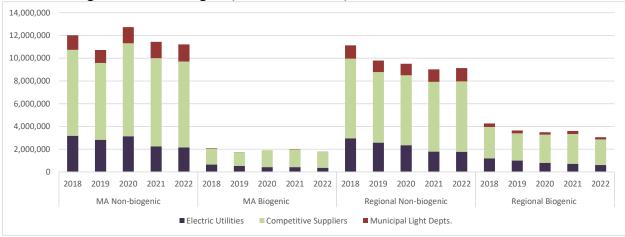




Table 4. GHG Emissions Reported by Retail Seller Type and Year using the Massachusettsbased methodology (Short Tons CO₂e)

	N	on-biogenic (GHG emissior	IS	Biogenic GHG emissions				
	2019	2020	2021	2022	2019	2020	2021	2022	
Electric	2,818,274	3,140,224	2,247,553	2,157,741	520,238	421,645	425,224	371,765	
Utilities									
Competitive	6,768,544	8,179,280	7,752,319	7,556,832	1,213,013	1,482,424	1,559,685	1,406,484	
Suppliers									
Municipal	1,140,160	1,424,945	1,449,539	1,492,009	19,490	8,410	35,258	1,617	
Light Depts.									
Total	10,726,978	12,744,449	11,449,411	11,206,583	1,752,741	1,912,479	2,020,167	1,779,866	

Table 5. GHG Emissions Reported by Retail Seller Type and Year using the Regional methodology (Short Tons CO₂e)

		Non-biogenic (GHG emission	ıs	Biogenic GHG emissions				
	2019	2020	2021	2022	2019	2020	2021	2022	
Electric Utilities	2,581,163	2,356,779	1,789,729	1,773,575	1,004,550	804,363	722,600	608,389	
Competitive Suppliers	6,191,248	6,142,781	6,141,486	6,191,164	2,392,169	2,477,265	2,605,989	2,247,656	
Municipal Light Depts.	1,025,657	1,015,131	1,091,351	1,168,782	253,369	208,607	267,916	200,707	
Total	9,798,068	9,514,691	9,022,566	9,133,520	3,650,089	3,490,235	3,596,505	3,056,752	

The GHG emissions for each individual retail seller, and the total GHG emissions for each of the three types of retail seller, can be found in Appendix 1: 2022 Individual Retail Seller GHG *Emissions*.

Appendix 1: 2022 Individual Retail Seller GHG Emissions

Below are GHG emissions for each retail seller calculated by MassDEP based on:

- the final GHG emission factors,
- MWh reported as retail load to MassDEP for compliance with the Clean Energy Standard by electric utilities and competitive suppliers and to the Department of Public Utilities (DPU) by MEDs, less MWh reported from unit-specific generation, and
- GHG emissions reported from unit-specific generation, as adjusted by MassDEP.¹²

Competitive suppliers that failed to submit reports as noted above, or that failed to re-submit corrected reports, are marked with an asterisk. GHG emissions were calculated for these retail sellers.

	Massach	usetts-based	approach	Regional approach			
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined	
Electric Utilities							
Unitil (Fitchburg Gas & Electric)	37,173	6,313	43,486	30,534	10,402	40,936	
National Grid (Mass. and Nantucket Electric)	1,201,425	210,507	1,411,932	988,309	341,775	1,330,083	
Eversource/NSTAR Electric and Western MA Electric	919,143	154,945	1,074,088	754,732	256,212	1,010,945	
Competitive Suppliers	1	•	•			1	
Actual Energy Inc	10,611	1,606	12,216	8,672	2,800	11,472	
Agera Energy LLC*	26	0	26	21	4	24	
Alpha Gas & Electric, LLC	2,545	421	2,966	2,088	703	2,791	
Ambit Northeast, LLC	29,628	4,845	34,473	24,295	8,130	32,424	
American Power & Gas of MA, LLC	222	0	222	174	30	204	
Astral Energy, LLC*	34	0	34	27	5	31	
Atlantic Energy, LLC	17,905	2,915	20,820	14,679	4,902	19,581	
BP Energy Retail Company, LLC	505,658	109,372	615,030	416,295	164,415	580,709	
Calpine Energy Solutions, LLC	295,593	45,257	340,850	241,569	78,533	320,101	
Catalyst Power & Gas, LLC	17	0	17	13	2	15	
Champion Energy Services	49,298	7,620	56,918	40,220	13,211	53,431	
CleanChoice Energy, Inc	44,915	7,939	52,854	36,963	12,837	49,800	
Clearview Electric, Inc	19,706	3,453	23,159	16,210	5,606	21,816	
Constellation NewEnergy, Inc.	2,781,947	470,402	3,252,349	2,276,129	781,956	3,058,085	
Devonshire Energy, LLC	10,931	2,349	13,280	9,089	3,484	12,573	
Direct Energy Business LLC	1,058,818	260,766	1,319,584	871,089	376,396	1,247,485	
Direct Energy Services, LLC	38,375	20,923	59,298	31,563	25,119	56,682	
Discount Power, Inc.	10,519	2,343	12,862	8,595	3,528	12,123	
Dynegy Energy Services (East), LLC	398,814	61,116	459,929	325,452	106,302	431,754	

Table 6. 2022 Massachusetts Retail Seller GHG Emissions (Short Tons CO ₂ e)
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¹² Alternative Compliance Payments (ACPs) are not considered as part of Retail Seller GHG Reporting, and certificates previously banked with DOER are accounted for in the year they were generated, and therefore result in no MWh being subtracted and no emissions being added to a retail seller's GHG emissions report in Step 4.

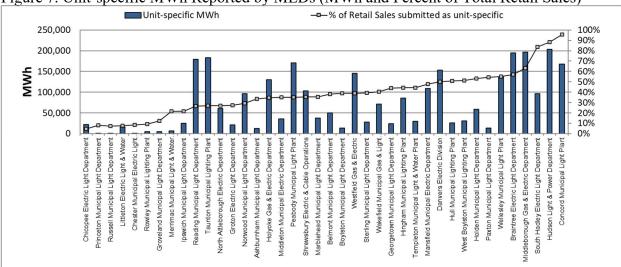
	Massach	usetts-based	approach	Re	gional appro	oach
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined
Eligo Energy MA, LLC	10,866	1,923	12,789	8,943	3,107	12,050
Energy Plus Holdings	2,612	944	3,556	2,152	1,227	3,379
Engie Resources, LLC	562,703	90,542	653,245	458,598	154,665	613,262
Everyday Energy, LLC	143	25	168	118	41	158
Rewards						
First Point Power	279,431	57,085	336,516	228,639	88,370	317,009
Great American Gas &	1	0	1	1	0	1
Electric, LLC						
Green Mountain Energy	2,524	456	2,980	2,080	730	2,809
Company						
Grid Power Direct, LLC	2,905	493	3,398	2,386	813	3,198
Hampshire Power	19	0	19	15	3	18
Corporation						
Harborside Energy of	4,403	684	5,087	3,602	1,177	4,779
Massachusetts, LLC						
Harvard Dedicated Energy, LTD	35,215	5,927	41,142	28,914	9,808	38,722
Hudson Energy Services	157,622	25,229	182,851	128,595	43,108	171,703
Inspire Energy Holdings,	109,935	18,651	128,586	90,297	30,747	121,044
LLC	10,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	10,001	120,000	,_,_,	20,717	121,011
Interstate Gas Supply, Inc	48,355	10,045	58,400	39,863	15,276	55,138
(dba IGS Energy)	.0,000	10,010		23,000	10,270	
Just Energy Mass. Corp.	3,098	1,127	4,225	2,679	1,385	4,064
Liberty Power Holdings*	531	0	531	416	71	487
Major Energy Electric Service, LLC	10,384	1,759	12,143	8,529	2,902	11,431
Massachusetts Gas &	13,459	2,292	15,751	11,057	3,772	14,829
Electric Co.	10,109	2,2>2	10,701	11,007	3,772	1,029
Mega Energy Holdings, LLC*	11,153	0	11,153	8,737	1,488	10,225
MidAmerican Energy Services LLC	15,126	2,836	17,962	12,485	4,463	16,948
MP2 Energy NE LLC	20,184	0	20,184	15,811	2,693	18,504
National Gas & Electric, Inc	8,981	1,569	10,550	7,386	2,551	9,937
NextEra Energy	617,710	115,900	733,610	508,507	183,163	691,670
Nordic Energy Services	5,620	956	6,576	4,616	1,574	6,190
Palmco Power MA, LLC	11,656	1,913	13,569	9,560	3,204	12,764
Provider Power Mass, LLC	33,428	5,403	38,831	27,396	9,118	36,514
Public Power, LLC	12,439	1,902	14,341	10,170	3,299	13,470
Reliant Energy Northeast	83,425	19,573	102,998	68,629	28,687	97,315
Renaissance Power and Gas	1,745	271	2,016	1,427	466	1,894
Residents Energy, LLC	71,877	15,055	86,932	59,101	22,924	82,025
SFE Energy Massachusetts	22,212	3,679	25,891	18,224	6,135	24,359
SmartEnergy Holdings, LLC	17,732	4,030	21,762	14,601	5,958	20,559
Starion Energy, Inc.*	44	0	44	35	6	41
Summer Energy	2,344	0	2,344	1,836	313	2,149
Sunwave Gas & Power	1,100	0	1,100	862	147	1,009
Massachusetts, Inc.*	1,100		1,100	002	14/	1,009
Texas Retail Energy	19,275	2,965	22,240	15,764	5,128	20,891
Think Energy, LLC	19,273	147	13,812	10,738	1,950	12,688

	Massach	usetts-based	approach	Re	egional appro	bach
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined
Titan Gas and Power	16,805	2,599	19,404	13,747	4,483	18,230
Town Square Energy, LLC	7,673	1,330	9,003	6,309	2,170	8,479
Verde Energy USA	10,993	1,838	12,831	9,023	3,051	12,074
Massachusetts, LLC	22.200	2.01.6	05.105	10.114	6.400	0.5.51.4
Viridian Energy, LLC	23,309	3,816	27,125	19,114	6,400	25,514
Xoom Energy Massachusetts LLC	8,572	2,193	10,765	7,063	3,123	10,186
Municipal Electric Departme	nts	·	•	•	·	•
Ashburnham Muni. Light Dept.	7,858	0	7,858	6,155	1,049	7,204
Belmont Municipal Light Dept.	25,830	0	25,830	20,234	3,447	23,681
Boylston Municipal Light Dept.	6,955	0	6,955	5,448	928	6,376
Braintree Electric Light Dept.	46,602	0	46,602	36,506	6,218	42,725
Chester Muni. Electric Light Dept.	1,735	0	1,735	1,359	231	1,591
Chicopee Electric Light Dept.	139,348	0	139,348	109,160	18,594	127,754
Concord Municipal Light Plant	2,517	1,617	4,134	1,973	1,952	3,925
Danvers Electric Division	48,458	0	48,458	37,960	6,466	44,426
Georgetown Municipal Light Dept.	9,801	0	9,801	7,677	1,308	8,985
Groton Electric Light Dept.	17,652	0	17,652	13,828	2,355	16,183
Groveland Municipal Light Dept.	10,636	0	10,636	8,332	1,419	9,751
Hingham Municipal Lighting Plant	34,626	0	34,626	27,124	4,620	31,745
Holden Municipal Light Dept.	16,638	0	16,638	13,034	2,220	15,254
Holyoke Gas & Electric Dept.	77,911	0	77,911	61,033	10,396	71,429
Hudson Light & Power Dept.	8,541	0	8,541	6,691	1,140	7,830
Hull Municipal Lighting Plant	7,930	0	7,930	6,212	1,058	7,271
Ipswich Municipal Light Dept.	28,863	0	28,863	22,610	3,851	26,462
Littleton Electric Light & Water	65,661	0	65,661	51,436	8,762	60,198
Mansfield Municipal Electric Dept.	38,247	0	38,247	29,961	5,104	35,065
Marblehead Municipal Light Dept.	21,884	0	21,884	17,143	2,920	20,063
Merrimac Muni. Light & Water	8,009	0	8,009	6,274	1,069	7,343
Middleborough Gas & Elec. Dept.	36,212	0	36,212	28,367	4,832	33,199
Middleton Muni. Electric Dept.	21,284	0	21,284	16,673	2,840	19,513

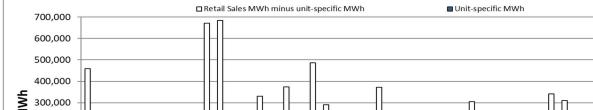
	Massachu	usetts-based	approach	Re	egional appro	oach
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined
North Attleboro Electric Dept.	52,601	0	52,601	41,205	7,019	48,224
Norwood Municipal Light Dept.	74,136	0	74,136	58,075	9,893	67,968
Paxton Municipal Light Dept.	3,629	0	3,629	2,843	484	3,327
Peabody Municipal Light Plant	100,458	0	100,458	78,695	13,405	92,100
Princeton Municipal Light Dept.	4,808	0	4,808	3,766	642	4,408
Reading Municipal Light Dept.	156,547	0	156,547	122,633	20,889	143,522
Rowley Municipal Lighting Plant	14,001	0	14,001	10,968	1,868	12,836
Russell Municipal Light Dept.	1,487	0	1,487	1,165	198	1,363
Shrewsbury Electric & Cable Ops.	59,699	0	59,699	46,766	7,966	54,732
South Hadley Electric Light Dept.	6,028	0	6,028	4,722	804	5,527
Sterling Municipal Light Dept.	13,559	0	13,559	10,621	1,809	12,430
Taunton Municipal Lighting Plant	159,193	0	159,193	124,706	21,242	145,948
Templeton Muni. Light & Water	12,203	0	12,203	9,560	1,628	11,188
Wakefield Muni. Gas & Light	33,158	0	33,158	25,975	4,425	30,399
Wellesley Municipal Light Plant	35,469	0	35,469	27,785	4,733	32,518
West Boylston Muni. Light. Plant	9,543	0	9,543	7,475	1,273	8,749
Westfield Gas & Electric	72,292	0	72,292	56,631	9,647	66,278
2022 Electric Utility Total	2,157,741	371,765	2,529,506	1,773,575	608,389	2,381,964
2022 Competitive Supplier Total	7,556,832	1,406,484	8,963,316	6,191,164	2,247,656	8,438,820
2022 MED Total	1,492,009	1,617	1,493,626	1,168,782	200,707	1,369,488
2022 RETAIL SELLER TOTAL	11,206,583	1,779,866	12,986,449	9,133,520	3,056,752	12,190,272

Appendix 2A: Optional Unit-Specific Generation Reported by MEDs for 2022

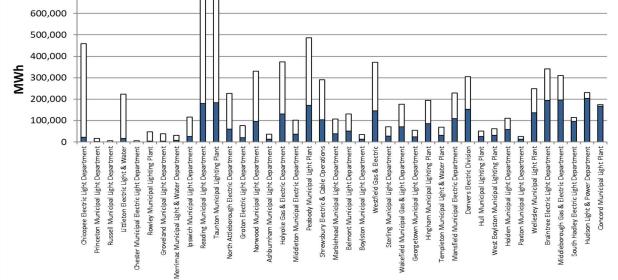
Below is a summary of the 2022 data that MEDs chose to submit from unit-specific generation. Most unit-specific generation submitted by MEDs in 2022 was non-emitting. Figures 7 and 8 show the unit-specific MWh reported by each MED and the ratio of their unit-specific MWh to their retail sales. MEDs are presented in order of increasing percentage of unit-specific generation reported. Figure 7 compares the unit-specific MWh reported as a percentage of total retail sales. Figure 8 shows the variation in total MWh sales. See Table 7 for individual MED values used in Figures 7 and 8. Table 8 shows the individual MED lb CO₂e/MWh emission rates (GHG emissions divided by retail load).











	MWh	MWh claimed specific gene		% of sales claimed as unit-
	reported as retail sales	non-emitting	emitting	specific generation
Ashburnham Muni. Light Dept.	37,125	12,454	0	33.5%
Belmont Municipal Light Department	131,553	50,453	0	38.4%
Boylston Municipal Light Dept.	35,660	13,823	0	38.8%
Braintree Electric Light Dept.	340,616	194,299	0	57.0%
Chester Municipal Electric Light Dept.	5,958	511	0	8.6%
Chicopee Electric Light Dept.	459,248	21,734	0	4.7%
Concord Municipal Light Plant	175,229	164,922	2,431	95.5%
Danvers Electric Division	305,210	153,066	0	50.2%
Georgetown Municipal Light Department	54,962	24,191	0	44.0%
Groton Electric Light Dept.	76,309	20,887	0	27.4%
Groveland Municipal Light Dept.	38,143	4,749	0	12.5%
Hingham Municipal Lighting Plant	194,726	86,011	0	44.2%
Holden Municipal Light Dept.	111,207	58,967	0	53.0%
Holyoke Gas & Electric Dept.	374,683	130,063	0	34.7%
Hudson Light & Power Dept.	230,399	203,583	0	88.4%
Hull Municipal Lighting Plant	50,809	25,910	0	51.0%
Ipswich Municipal Light Department	115,869	25,246	0	21.8%
Littleton Electric Light & Water	222,973	16,815	0	7.5%
Mansfield Municipal Electric Dept.	229,501	109,417	0	47.7%
Marblehead Municipal Light Dept.	106,606	37,896	0	35.5%
Merrimac Municipal Light & Water Dept.	32,002	6,856	0	21.4%
Middleborough Gas & Electric Dept.	310,756	197,061	0	63.4%
Middleton Municipal Electric Dept.	102,691	35,865	0	34.9%
North Attleboro Electric Dept.	226,111	60,959	0	27.0%
Norwood Municipal Light Dept.	329,443	96,676	0	29.3%
Paxton Municipal Light Dept.	24,887	13,494	0	54.2%
Peabody Municipal Light Plant	486,422	171,012	0	35.2%
Princeton Municipal Light Dept.	16,411	1,316	0	8.0%
Reading Municipal Light Dept.	670,790	179,276	0	26.7%
Rowley Municipal Lighting Plant	48,363	4,405	0	9.1%
Russell Municipal Light Department	5,046	377	0	7.5%
Shrewsbury Electric & Cable Ops.	290,275	102,838	0	35.4%
South Hadley Electric Light Dept.	114,984	96,057	0	83.5%
Sterling Municipal Light Dept.	70,295	27,725	0	39.4%
Taunton Municipal Lighting Plant	683,325	183,503	0	26.9%
Templeton Municipal Light & Water	68,689	30,374	0	44.2%
Wakefield Municipal Gas & Light Dept.	175,449	71,342	0	40.7%
Wellesley Municipal Light Plant	248,547	137,184	0	55.2%
West Boylston Municipal Lighting Plant	61,306	31,345	0	51.1%
Westfield Gas & Electric	372,173	145,195	0	39.0%
MED Total	7,634,751	2,947,857	2,431	38.6%

Table 7. Individual 2022 MED Percent of Sales Claimed as Unit-Specific Generation

	Massachusetts-based approach		Regional a	pproach
	Non-Biogenic	Biogenic	Non-Biogenic	Biogenic
Final 2022 Retail Seller Emission Factors from Table 2 (applied only to non-unit- specific generation - shown for comparison)	637	0	499	85
Ashburnham Muni. Light Dept.	423	0	332	56
Belmont Municipal Light Department	393	0	308	52
Boylston Municipal Light Dept.	390	0	306	52
Braintree Electric Light Dept.	274	0	214	37
Chester Municipal Electric Light Dept.	582	0	456	78
Chicopee Electric Light Dept.	607	0	475	81
Concord Municipal Light Plant	29	18	23	22
Danvers Electric Division	318	0	249	42
Georgetown Municipal Light Department	357	0	279	48
Groton Electric Light Dept.	463	0	362	62
Groveland Municipal Light Dept.	558	0	437	74
Hingham Municipal Lighting Plant	356	0	279	47
Holden Municipal Light Dept.	299	0	234	40
Holyoke Gas & Electric Dept.	416	0	326	55
Hudson Light & Power Dept.	74	0	58	10
Hull Municipal Lighting Plant	312	0	245	42
Ipswich Municipal Light Department	498	0	390	66
Littleton Electric Light & Water	589	0	461	79
Mansfield Municipal Electric Dept.	333	0	261	44
Marblehead Municipal Light Dept.	411	0	322	55
Merrimac Municipal Light & Water Dept.	501	0	392	67
Middleborough Gas & Electric Dept.	233	0	183	31
Middleton Municipal Electric Dept.	415	0	325	55
North Attleboro Electric Dept.	465	0	364	62
Norwood Municipal Light Dept.	450	0	353	60
Paxton Municipal Light Dept.	292	0	228	39
Peabody Municipal Light Plant	413	0	324	55
Princeton Municipal Light Dept.	586	0	459	78
Reading Municipal Light Dept.	467	0	366	62
Rowley Municipal Lighting Plant	579	0	454	77
Russell Municipal Light Department	589	0	462	79
Shrewsbury Electric & Cable Ops.	411	0	322	55
South Hadley Electric Light Dept.	105	0	82	14
Sterling Municipal Light Dept.	386	0	302	51
Taunton Municipal Lighting Plant	466	0	365	62
Templeton Municipal Light & Water	355	0	278	47
Wakefield Municipal Gas & Light Dept.	378	0	296	50
Wellesley Municipal Light Plant	285	0	224	38
West Boylston Municipal Lighting Plant	311	0	244	42
Westfield Gas & Electric	388	0	304	52
Average MED Emission Factors	391	0	306	53

Table 8. Individual 2022 MED Emission Factors (lb CO₂e/MWh)

Figures 9 and 10 show the MWh reported by MEDs from unit-specific generation by fuel and reporting type and by location and reporting type. Figures 11, 12 and 13 show the unit-specific generation reported by MEDs as a percent by fuel, by location and by reporting type. Information on GHG emissions of each MED can be found in Appendix 1: 2022 Individual *Retail Seller GHG Emissions*.

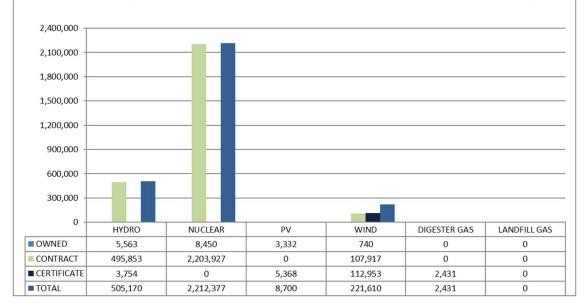
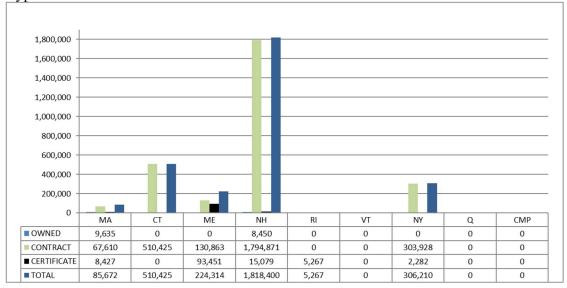


Figure 9. MWh reported by MEDs from unit-specific generation by Fuel and Reporting Type

Figure 10. MWh reported by MEDs from unit-specific generation by Location and Reporting Type



(Q = Quebec; CMP = Canadian Maritime Provinces)

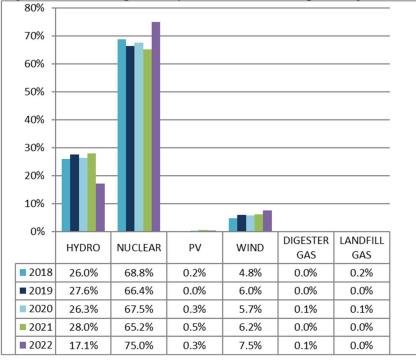
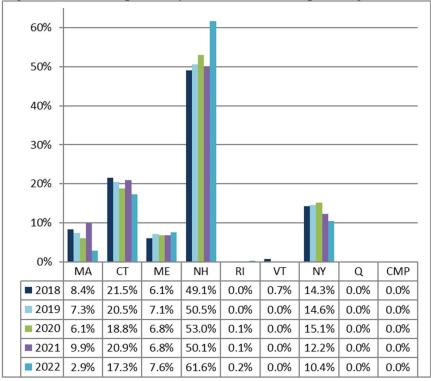


Figure 11. MWh reported by MEDs from unit-specific generation as Percent by Fuel Type

Figure 12. MWh reported by MEDs from unit-specific generation as Percent by Location



(Q = Quebec; CMP = Canadian Maritime Provinces)

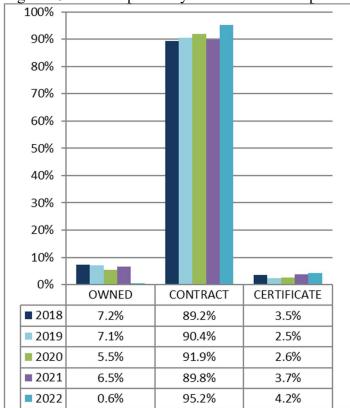


Figure 13. MWh reported by MEDs from unit-specific generation as Percent by Reporting Type

Appendix 2B: Unit-Specific Generation from GIS Certificates Reported by Electric Utilities and Competitive Suppliers for 2022

Below is a summary of the 2022 data reported by electric utilities and competitive suppliers from unit-specific generation. Because the certificates, by state and fuel type, purchased by electric utilities and competitive suppliers for compliance¹³ with various programs are already included in the RPS/APS/CES Annual Compliance Reports,¹⁴ that information is not repeated in this summary. The use of banked certificates or payments¹⁵ by electric utilities and competitive suppliers to meet their compliance requirements with these programs is not reflected in this summary.

"N/A" appears in the unit-specific generation columns for competitive suppliers that did not submit any unit-specific information. Competitive suppliers that failed to submit, or to correct, a unit specific or GHG emissions report are marked with an asterisk. The percent of sales claimed as unit-specific generation were calculated for those retail sellers, where possible.

	MWh reported as mit-		% of sales claimed as	
	retail sales	non- emitting	emitting	unit-specific generation
Electric Utilities				
Unitil (Fitchburg Gas & Electric Co.)	178,816	75,999	6,600	46.2%
National Grid (Mass. and Nantucket Electric)	5,931,375	2,622,636	220,091	47.9%
Eversource/NSTAR Electric Co. and Western MA	4,396,713	1,851,951	162,000	45.8%
Electric Cos.				
Competitive Suppliers				
Actual Energy Inc	45,375	15,596	1,679	38.1%
Agera Energy LLC*	83	N/A	N/A	0.0%
Alpha Gas & Electric, LLC	11,826	4,760	440	44.0%
Ambit Northeast, LLC	145,515	63,160	5,066	46.9%
American Power & Gas of MA, LLC	697	0	0	0.0%
Astral Energy, LLC*	107	N/A	N/A	0.0%
Atlantic Energy, LLC	82,384	32,587	3,048	43.3%
BP Energy Retail Company, LLC	2,421,790	1,003,441	123,223	46.5%
Calpine Energy Solutions, LLC	1,252,888	416,919	53,016	37.5%
Catalyst Power & Gas, LLC	61	9	0	14.8%
Champion Energy Services	213,781	74,047	8,181	38.5%
CleanChoice Energy, Inc	220,557	97,012	8,300	47.8%
Clearview Electric, Inc	96,938	42,670	3,610	47.7%
Constellation NewEnergy, Inc.	12,473,491	4,612,504	530,300	41.2%
Devonshire Energy, LLC	51,819	22,669	2,456	48.5%
Direct Energy Business LLC	4,795,734	1,742,301	332,727	43.3%
Direct Energy Services, LLC	185,576	58,426	28,418	46.8%

Table 9: Individual 2022 Electric Utility and Competitive Supplier Percent of Sales Claimed as Unit-Specific Generation

¹³ Retired certificates from units that produce thermal energy are not reported for the purpose of calculating GHG emissions from electricity.

¹⁴ These reports can be found at <u>https://www.mass.gov/service-details/annual-compliance-reports-and-other-publications</u>.

¹⁵ See footnote 12.

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Hudson Energy Services640,172Inspire Energy Holdings, LLC520,360Interstate Gas Supply, Inc (dba IGS Energy)246,733Just Energy Mass. Corp.32,225Liberty Power Holdings*1,668Major Energy Electric Service, LLC47,346Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,923Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC1153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		6,197	43.5%
Inspire Energy Holdings, LLC520,360Interstate Gas Supply, Inc (dba IGS Energy)246,733Just Energy Mass. Corp.32,225Liberty Power Holdings*1,668Major Energy Electric Service, LLC47,346Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC446,668Titan Gas and Power73,411Town Square Energy, LLC446,668Titan Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		27,470	34.3%
Interstate Gas Supply, Inc (dba IGS Energy)246,733Just Energy Mass. Corp.32,225Liberty Power Holdings*1,668Major Energy Electric Service, LLC47,346Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, ILC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		19,500	45.3%
Just Energy Mass. Corp.32,225Liberty Power Holdings*1,668Major Energy Electric Service, LLC47,346Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC49,463Viridian Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72	/	11,050	50.1%
Liberty Power Holdings*1,668Major Energy Electric Service, LLC47,346Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		1,178	81.2%
Major Energy Electric Service, LLC47,346Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,202National Gas & Electric, Inc42,650NextEra Energy2,904,922Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,712Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC49,463Viridian Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		N/A	0.0%
Massachusetts Gas & Electric Co.65,982Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		1,839	43.2%
Mega Energy Holdings, LLC*35,017MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		2,396	47.2%
MidAmerican Energy Services LLC75,014MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		N/A	0.0%
MP2 Energy NE LLC110,203National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy46,668Titan Gas and Power73,411Town Square Energy, LLC49,463Viridian Energy, LLC49,463		2,965	49.0%
National Gas & Electric, Inc42,650NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy46,668Titan Gas and Power73,411Town Square Energy, LLC49,463Viridian Energy, LLC114,72	,	0	42.5%
NextEra Energy2,904,92Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,712Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		1,640	45.8%
Nordic Energy Services27,221Palmco Power MA, LLC52,761Provider Power Mass, LLC153,713Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		143,375	45.5%
Palmco Power MA, LLC52,761Provider Power Mass, LLC153,712Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		1,000	46.6%
Provider Power Mass, LLC153,712Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC49,463Viridian Energy, LLC114,72		2,000	42.4%
Public Power, LLC61,377Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		5,649	43.1%
Reliant Energy Northeast403,920Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		1,989	46.4%
Renaissance Power and Gas7,494Residents Energy, LLC353,780SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		22,740	46.9%
Residents Energy, LLC353,786SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		283	38.6%
SFE Energy Massachusetts98,979SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		16,925	47.7%
SmartEnergy Holdings, LLC80,767Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		3,846	41.6%
Starion Energy, Inc.*139Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		5,568	43.8%
Summer Energy7,358Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72	N/A	N/A	0.0%
Sunwave Gas & Power Massachusetts, Inc.*3,454Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		0	0.0%
Texas Retail Energy81,852Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		N/A	0.0%
Think Energy, LLC46,668Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72		3,100	37.8%
Titan Gas and Power73,411Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,722		154	9.1%
Town Square Energy, LLC37,112Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,72	· · · · · · · · · · · · · · · · · · ·	2,717	39.6%
Verde Energy USA Massachusetts, LLC49,463Viridian Energy, LLC114,721		1,391	46.7%
Viridian Energy, LLC 114,72		1,922	42.3%
		3,990	47.0%
		2,588	47.5%
Electric Utility Total 10,506,90		388,691	47.0%
Competitive Supplier Total10,300,3034,000,68			41.8%
Competitive Supplier Total34,000,00Combined Total44,507,59		1,631,455 2,020,146	41.8%

Table 10 shows the individual electric utility and competitive supplier lb CO₂e/MWh emission rates (GHG emissions divided by retail load). The emission factors for individual electric utilities and competitive suppliers in Table 10 should not be compared to the emission factors calculated for MEDs in Table 8 in Appendix 2A: Optional Unit-Specific Generation Reported by MEDs for 2022, because the requirement to retire MSW certificates¹⁶ causes electric utilities and competitive suppliers to have higher emission factors than MEDs.

Competitive suppliers that failed to submit, or to correct, a unit specific or GHG emissions report are marked with an asterisk. Individual emission factors were calculated for those retail sellers.

Table 10: Individual 2022 Emission Fact	tors for Electric Utilities and Co	mpetitive Suppliers (lb
CO ₂ e/MWh)		
	Massachusetts-based	

	Massachusetts-based approach		Regional ap	oproach
	Non-Biogenic	Biogenic	Non-Biogenic	Biogenic
Final 2022 Retail Seller Emission Factors from	637	0	499	85
Table 2 (applied only to non-unit-specific				
generation - shown for comparison)				
Electric Utilities				
Unitil (Fitchburg Gas & Electric Co.)	416	71	342	116
National GRID (Mass. and Nantucket Electric)	405	71	333	115
Eversource/NSTAR Electric Co. and Western MA				
Electric Cos.	418	70	343	117
Competitive Suppliers				
Actual Energy Inc	468	71	382	123
Agera Energy LLC*	637	0	499	85
Alpha Gas & Electric, LLC	430	71	353	119
Ambit Northeast, LLC	407	67	334	112
American Power & Gas of MA, LLC	637	0	499	85
Astral Energy, LLC*	637	0	499	85
Atlantic Energy, LLC	435	71	356	119
BP Energy Retail Company, LLC	418	90	344	136
Calpine Energy Solutions, LLC	472	72	386	125
Catalyst Power & Gas, LLC	543	0	425	72
Champion Energy Services	461	71	376	124
CleanChoice Energy, Inc	407	72	335	116
Clearview Electric, Inc	407	71	334	116
Constellation NewEnergy, Inc.	446	75	365	125
Devonshire Energy, LLC	422	91	351	134
Direct Energy Business LLC	442	109	363	157
Direct Energy Services, LLC	414	225	340	271
Discount Power, Inc.	471	105	385	158
Dynegy Energy Services (East), LLC	456	70	372	121
Eligo Energy MA, LLC	408	72	336	117
Energy Plus Holdings	412	149	339	193
Engie Resources, LLC	494	79	403	136
Everyday Energy, LLC Rewards	410	72	337	116
First Point Power	452	92	370	143
Great American Gas & Electric, LLC	637	0	499	85

¹⁶ See footnote 10.

	Massachusetts-based approach		Regional a	oproach
	Non-Biogenic	Biogenic	Non-Biogenic	Biogenic
Green Mountain Energy Company	411	74	339	119
Grid Power Direct, LLC	426	72	350	119
Hampshire Power Corporation	505	0	395	67
Harborside Energy of Massachusetts, LLC	458	71	375	122
Harvard Dedicated Energy, LTD	436	73	358	121
Hudson Energy Services	492	79	402	135
Inspire Energy Holdings, LLC	423	72	347	118
Interstate Gas Supply, Inc (dba IGS Energy)	392	81	323	124
Just Energy Mass. Corp.	192	70	166	86
Liberty Power Holdings*	637	0	499	85
Major Energy Electric Service, LLC	439	74	360	123
Massachusetts Gas & Electric Co.	408	69	335	114
Mega Energy Holdings, LLC*	637	0	499	85
MidAmerican Energy Services LLC	403	76	333	119
MP2 Energy NE LLC	366	0	287	49
National Gas & Electric, Inc	421	74	346	120
NextEra Energy	425	80	350	126
Nordic Energy Services	413	70	339	116
Palmco Power MA, LLC	442	73	362	121
Provider Power Mass, LLC	435	70	356	119
Public Power, LLC	405	62	331	108
Reliant Energy Northeast	413	97	340	142
Renaissance Power and Gas	466	72	381	124
Residents Energy, LLC	406	85	334	130
SFE Energy Massachusetts	449	74	368	124
SmartEnergy Holdings, LLC	439	100	362	148
Starion Energy, Inc.*	637	0	499	85
Summer Energy	637	0	499	85
Sunwave Gas & Power Massachusetts, Inc.*	637	0	499	85
Texas Retail Energy	471	72	385	125
Think Energy, LLC	586	6	460	84
Titan Gas and Power	458	71	375	122
Town Square Energy, LLC	414	72	340	117
Verde Energy USA Massachusetts, LLC	444	74	365	123
Viridian Energy, LLC	406	67	333	112
Xoom Energy Massachusetts LLC	412	105	339	150
Average Electric Utility Emission Factors	411	71	338	116
Average Competitive Supplier Emission Factors	445	83	364	132

Appendix 3: 2022 Retail Level Emission Factors for Use by Consumers of Electricity to Report Greenhouse Gas Emissions (Massachusetts-based Emission Factors)

Some electricity consumers have expressed interest in using Massachusetts-specific greenhouse gas (GHG) emission factors (EFs) to report their GHG emissions from use of electricity. The EFs shown earlier in this document are often not appropriate for use by electricity consumers for two reasons: first, the EFs earlier in this document are for the combination of CO₂, CH₄ and N₂O when many electricity consumers seek EFs for the individual gases and, second, the EFs earlier in this document are per wholesale MWh, rather than per retail meter MWh (or kWh) that electricity consumers see on their electric bill. In order to assist electricity consumers in reporting GHGs, this appendix presents the 2022 EFs that consumers of electricity would use to report their GHG emissions at a retail electricity level.

<u>Combined, Biogenic and Non-Biogenic EFs</u>: Progress on achieving the GHG reduction limits in the Global Warming Solutions Act is determined using Massachusetts-based emission calculations. Thus, it is Massachusetts-based EFs that consumers of electricity should use to determine GHG emissions. The Massachusetts-based non-biogenic EFs include all CO₂, CH₄ and N₂O emissions from non-biogenic (fossil) and CH₄ and N₂O emissions from biogenic (nonfossil) fuels combusted to generate the electricity sold by retail sellers of electricity in Massachusetts. The Massachusetts-based biogenic EFs include only the CO₂ from biogenic fuel combustion. The Combined EF adds the Non-Biogenic and Biogenic EFs together.

2022 RS Wholesale Non-Biogenic MA-based EF	454 lb Non-Biogenic CO ₂ e/Wholesale MWh
+ 2022 RS Wholesale Biogenic MA-based EF	+ 55 lb Biogenic CO ₂ e/Wholesale MWh
2022 RS Wholesale Combined MA-based EF	509 lb Combined CO ₂ e/Wholesale MWh

<u>Wholesale v. Retail EFs (line losses)</u>: Power lines lose 6%¹⁷ (on average) of the electricity they carry. The amount of wholesale MWh needed to deliver a particular amount of electricity at the retail level is, therefore, 6% greater than the amount shown on a retail meter. The emissions released to produce the electricity can be spread out over either the larger number of wholesale MWh or the smaller number of retail MWh, such that the retail lb/MWh EF will always be higher than the wholesale lb/MWh EF:

Wholesale Combined EF / (100% of MWh – 6% of MWh due to line losses) = Retail Combined EF

Specifically: 509 lb CO ₂ e/Wholesale MWh /	(1 - 0.06) = 541 lb CO ₂ e/Retail MWh
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	Retail Seller Wholesale Level	Electricity Consumer Retail Level		
	(lb CO ₂ e/Wholesale MWh)	(lb CO ₂ e/Retail MWh)		
Non-Biogenic	454	483		
Biogenic	55	59		
Combined	509	541		

Table 11. 2022 Massachusetts-based CO2e GHG Emission Factors

¹⁷ This value was updated to align with the line loss value used in the Interim Massachusetts Clean Energy and Climate Plan for 2030, dated December 2020.

Individual CO₂, CH₄, and N₂O EFs: If a consumer wants to use EFs by individual gas, then the lb CO₂e/MWh value needs to be separated into the individual components: lb CO₂/MWh, lb CH₄/MWh, and lb N₂O/MWh. MassDEP has separated the three gases by alternately zeroing out the other two gases on the 'Calculating CO2e' and the 'GIS CO2e' tabs of the retail seller EF spreadsheet at <u>https://www.mass.gov/lists/massachusetts-greenhouse-gas-ghg-reporting-program-data#massdep-emission-factor-calculations-</u>. For the 2022 retail level Combined EF, this results in 540 lb of CO₂e from CO₂, 1 lb of CO₂e from CH₄, and 2 lb of CO₂e from N₂O. The global warming potential (GWP) of each gas must then be taken into account to determine the EF for each gas. The GWPs used through 2022 by MassDEP are: 1 for CO₂, 25 for CH₄, and 298 for N₂O.¹⁸

 $\label{eq:constraint} \begin{array}{l} \mbox{lb } {\rm CO}_2{\rm e}/{\rm MWh} = (({\rm lb } {\rm CO}_2 * 1) + ({\rm lb } {\rm CH}_4 * 25) + ({\rm lb } {\rm N}_2{\rm O} * 298)) / {\rm MWh}. \ Specifically, \\ \mbox{1.1 } {\rm lb } {\rm CO}_2{\rm e} \ {\rm from } {\rm CH}_4 / 25 = 0.043 \ {\rm lb } {\rm CH}_4 \ and \ 1.6 \ {\rm lb } {\rm CO}_2{\rm e} \ {\rm from } {\rm N}_2{\rm O} / 298 = 0.006 \ {\rm lb } {\rm N}_2{\rm O}; \\ \ therefore, \\ \mbox{541 } {\rm lb } {\rm CO}_2{\rm e}/{\rm Retail } \ {\rm MWh} = (540 \ {\rm lb } {\rm CO}_2 + (0.043 \ {\rm lb } {\rm CH}_4 * 25) + (0.006 \ {\rm lb } {\rm N}_2{\rm O} * 298)) / {\rm Retail } \\ \ {\rm MWh} \end{array}$

The breakdown of the 541 lb CO₂e/Retail MWh value from Table 11 into individual gases, at various scales of electricity, is shown in Table 12.

Table 12. 2022 Electricity Consumers Retail-level Massachusetts-based GHG Emission Factors by Individual Gas

	CO ₂	CH4	N ₂ O
lb/Retail kWh	0.540	0.000043	0.000006
lb/Retail MWh	540	0.043	0.006
lb/Retail GWh	540,000	43	6

The lb/Retail kWh values in the upper row of Table 12 may be the values most likely to be used by electricity consumers since most electric bills show kWh use.

The breakdown of the 540 lb CO_2 /Retail MWh value from Table 12 into its non-biogenic and biogenic components is shown in Table 13. All CH_4 and N_2O emissions are considered non-biogenic and thus cannot be further broken down.

Table 13. 2022 Electricity Consumers Retail-level Massachusetts-based Non-Biogenic and Biogenic CO₂ Emission Factors

	CO ₂	
	Non-Biogenic CO ₂	Biogenic CO ₂
lb/Retail kWh	0.481	0.059
lb/Retail MWh	481	59
lb/Retail GWh	481,000	59,000

¹⁸ Beginning with the 2014 EFs, MassDEP updated the global warming potentials (GWPs) it uses based on the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report (AR4), published in 2007, similar to most other reporting programs. The global GWPs used with earlier EFs were from IPCC's Second Assessment Report (SAR) published in 1996.