



June 28, 2016

Michael Judge
Director, Renewable and Alternative Energy Development
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020, Boston, MA 02114

Re: Comments – Renewable Heating and Cooling in the Alternative Portfolio Standard

Dear Mr. Judge,

I am writing to submit comments on the Department of Energy Resources' draft Alternative Portfolio Standard regulation, 225 CMR 16.00.

Clean Asset Partners represents renewable energy system owners in Massachusetts's renewable energy certificate markets. We appreciate the opportunity to comment and would like to express support for three aspects of the draft regulation in particular.

We support the draft regulation's framework that differentiates metering requirements by categories of system size. We also support the forward minting provisions for small projects, and pre-minting in years where that would not be expected to alter the market's supply and demand dynamics. Additionally we support the use of Alternative Energy Certificate multipliers for certain renewable thermal technologies with no on-site emissions.

We think DOER's approach as proposed in the draft regulation will substantially increase the viability for a number of renewable thermal project types to participate in the APS where their participation otherwise would be difficult or perhaps not possible.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Steven Kaufman".

Steven Kaufman
Managing Director