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Ms. Judith Johnson, Commissioner  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, Massachusetts 02114

Dear Commissioner Johnson:

I would like to comment on Massachusetts Department of Energy Resources' (DOER) forthcoming regulations to include useful thermal energy in the state's Alternative Portfolio Standard (APS).

As you know the Massachusetts General Court passed S.2214 (Chapter 251 of the Acts of 2014), paving the way for renewable heating and cooling technologies to qualify for Alternative Energy Credits under the Commonwealth's existing APS. Our company manufactures and sells energy recovery ventilation equipment for comfort HVAC applications in Massachusetts. We certify our equipment with AHRI, using independent third party testing to verify performance. We encourage DOER to consider widening the APS scope to include AHRI certified air-to-air energy recovery ventilators.

Air-to-air energy recovery ventilation equipment (AAERVE) uses the naturally occurring temperature difference between indoor and outdoor air to pre-condition outdoor ventilation air thereby reducing the workload and energy consumption of a building's HVAC system by up to 50 percent. AAERVE provides significant potential for greenhouse gas (GHG) reduction, energy savings, and occupant health improvement by generating useful thermal energy. The useful thermal energy generated by AAERVE equipment can be monitored. In fact, ASHRAE 90.1-2010 requires the use of ERV, which the Department of Energy has proven to be cost effective, and 90.1-2010 is included in the latest building code in MA. But replacement of worn out equipment does not necessarily have to meet the latest code, resulting in lost opportunity for energy savings and GHG reduction. Including AHRI-certified AAERVE in the APS offers the potential to significantly increase GHG reduction.

Please encourage the Department of Energy Resources to consider air-to-air energy recovery as they develop new approaches for the state's Alternative Portfolio Standard.

Sincerely,

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