

2016/6/24

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

Dear Commissioner Johnson:

I would like to offer comments on upcoming regulations by your agency to include useful thermal energy in the state's Alternative Portfolio Standard (APS).

Our company manufactures air-to-air energy recovery ventilation equipment, usually called ERVs, here in Wisconsin, and sells this equipment for comfort HVAC applications in Massachusetts and across the United States.

In Massachusetts a significant number of engineers, builders and contractors are involved in specifying, applying and competing to improve the energy-efficiency and value of the homes and buildings they are creating by using ERVs from us (and from our competitors). In fact, Massachusetts is home to one of our competitors, a significant manufacturer of one type of ERV component.

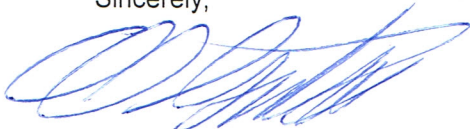
ERVs provide necessary outdoor air ventilation to maintain good indoor air quality (IAQ) while reducing the energy consumption of that ventilation by 60-80%. ERVs effectively generate thermal energy and accomplish greenhouse gas (GHG) reduction, energy savings, and occupant health improvement. The useful 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.

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. 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.

Including AHRI-certified AAERVE in the APS offers the potential to significantly increase GHG reduction.

I appreciate the leadership displayed by the Commonwealth of Massachusetts in providing alternatives to traditional energy consumption. Please consider air-to-air energy recovery as they develop new approaches for the state's Alternative Portfolio Standard.

Sincerely,



Chuck Gates  
President  
608-221-4499 x 250  
[cgate@renewaire.com](mailto:cgate@renewaire.com)