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July 14, 2017

Department of Energy Resources
Attn.: Samantha Meserve
100 Cambridge Street, Suite 1020
Boston MA 02114

Re: Eversource Comments on Proposed Alternative Energy Portfolio Standards

Dear Ms. Meserve:

Eversource Energy Service Company, on behalf of NSTAR Electric Company, NSTAR Gas Company and Western Massachusetts Electric Company, each d/b/a Eversource Energy, (collectively “Eversource”), submits this comment letter to the Massachusetts Department of Energy Resources (“DOER”) in response to the recently proposed Alternative Energy Portfolio Standards (“AEPS”).

Eversource operates New England’s largest utility system serving more than 3.6 million electric and natural gas customers in Connecticut, Massachusetts and New Hampshire. In order to meet its obligations to provide vital public services, Eversource ensures reliability and safety standards are maintained in compliance with national, regional and industry standards and policies. Eversource values its role as an environmental steward and strives to ensure that all required activities are carried out in accordance with numerous federal, state and local environmental regulations.

Eversource agrees with the Commonwealth’s energy diversity legislation to embrace advanced technologies that promote its commitment to reducing energy costs while strengthening the state’s clean energy economy and progressing towards Massachusetts’s greenhouse gas reduction requirements. To that end, Eversource supports the DOER’s proposed Renewable Thermal Strategy and the deployment of the diverse technologies available to assist the Commonwealth in meeting its clean energy goals

Eversource agrees with the Commonwealth’s approach to include diverse technologies such as advanced fuel cells in the proposed AEPS regulations. Development and deployment of these technologies is critical for the Commonwealth’s current and future Global Warming Solutions Act (“GWSA”) targets. Innovative expansion of AEPS programs will assist in the Commonwealth in enabling these technologies to create a critical path towards a future clean energy economy.

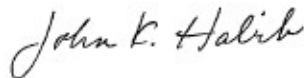
Eversource agrees with the DOER's proposed eligibility requirements, including the requirement in 225 C.M.R. 16.05(1)(e), Net Carbon Dioxide Emission Rate:, which states a ".....Generation Unit shall not exceed a net carbon dioxide emissions rate equal to the average emissions rate of existing natural gas plants in Massachusetts at the time when the Generation Unit is qualified." Given the complexity and high electrical generating efficiency of fuel cells, this strict standard should be used as an alternative to the proposed Overall All Efficiency Standard (225 CMR 16.05(1)(a)7.b.) for a fuel cell to qualify as an APS Alternative Generation Unit. This will simplify costly metering requirements used for compliance determinations allowing for deployment of this clean, efficient maturing technology.

In order for Massachusetts to meets its future GWSA targets, Eversource suggests APS credits for Fuel Cells be limited to Massachusetts only, as opposed to the ISO-NE Control area.

Eversource further agrees with the DOER's concept of an "Attribute Multiplier (225 CMR 16.05(1) (a)7.c.)", to promote renewable low carbon technologies with competitive growth potential. Eversource is sensitive to the Commonwealth's needs to balance a clean reliable supply of energy with the challenges of a growing competitive economy and the use of a multiplier will facilitate deployment of this and future technologies. However, Eversource suggests a value of two AEPS Alternative Energy Attributes for each mWh of electricity and/or 3,412,000 British thermal units of net Useful Thermal Energy generated. The proposed value of one and one half AEPS Alternative Energy Attributes is an improvement over the current standard but is insufficient to promote customer adoption of these assets.

Eversource thanks DOER for the opportunity to comment on these regulatory changes the Commonwealth's AEPS and looks forward to working with you in the future to implement the change.

Very truly yours,

A handwritten signature in cursive script that reads "John K. Habib".

John K. Habib