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July 7, 2017

Commissioner Judith Judson  
Massachusetts Department of Energy Resources  
100 Cambridge Street  
Boston, MA 02114

Dear Commissioner Judson:

The Home Depot, Inc. submits comments in support of the draft Alternative Portfolio Standard (APS) regulations. The Home Depot greatly appreciates that fuel cells have been included in the current APS proceeding and are looking forward to final promulgation.

The Home Depot is working with Bloom Energy Corporation to install fuel cell systems at many of its retail stores. The projects have been designed to isolate the stores from the electric grid in the event of a system outage and will incorporate integrated energy storage capabilities to allow for response to peak load events. These regulations go a long way to help achieve cost savings, contribute to companywide sustainability goals and ensuring that stores can continue to serve their communities during an extended electric grid outage.

However, as currently drafted these regulations present a hurdle to fuel cell development in Massachusetts. Section 16.05(1)(a)(7)(b) of the draft regulations require that fuel cell generation must "meet an overall efficiency of 60%." Depending on how it is measured, this limit, which is redundant to other requirements in the regulation, would exclude even the most efficient commercially available generation in a non CHP scenario. It would also fail to take into account other benefits of fuel cells including their unique ability to offset pollutant emissions and their contributions to customer and system resiliency.

Thank you for your consideration on this matter. The Home Depot, Inc. looks forward to working with you and your team to advance the timely promulgation of the APS regulations.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Hawkins", written over a horizontal line.

David Hawkins  
VP Labor\_Building Maintenance\_Customer Care  
770-384-2196

A handwritten signature in black ink, appearing to read "Craig D'Arcy", written over a horizontal line.

Craig D'Arcy  
Director of Energy  
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