



July 8, 2017

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

Dear Commissioner Judson:

TechNet (www.technet.org) is the national, bipartisan network of over 70 technology companies that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic startups to the most iconic companies on the planet and represents more than two million employees in the fields of information technology, e-commerce, clean energy, telecommunications, gig economy, sharing economy, venture capital, and finance. TechNet is committed to advancing the public policies and private sector initiatives that make the U.S. the most innovative country in the world.

On behalf of our membership, TechNet writes in support of the draft Alternative Portfolio Standard (APS) regulations released on June 2, 2017. These regulations will go a long way to supporting clean energy growth. However, we have one serious concern with the regulations that would ultimately create 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%."

This requirement has the potential to adversely impact the technology sector, in particular those companies that would like to deploy high reliability distributed generation but do not happen to have a matching thermal and electric load. This standard should be removed as there is already another efficiency standard in place. Section 16.05(1)(e) of the draft regulations that APS requires generators to comply with a net carbon dioxide emissions rate to be established by the DOER at least every two years. In order to create a level playing field and more certainty in the market, TechNet respectfully request the 60% efficiency standard be removed.

Thank you for consideration in this matter. Please do not hesitate to reach out if you have any questions or if we may be able to provide you with additional information.

Respectfully,

Matt Mincieli
Northeast Region Executive Director, TechNet