

# MASSACHUSETTS FOREST ALLIANCE

249 Lakeside Avenue, Marlborough Massachusetts 01752-4503  
www.MassForestAlliance.org | (617) 455 - 9918 | info@MassForestAlliance.org



August 20, 2021

Darchelle Petion  
Department of Energy Resources  
100 Cambridge St, Suite 1020  
Boston, MA 02114

## Board of Directors

### **Dicken Crane**

*President*  
Windsor, MA

### **Charles Thompson**

*Immediate Past President*  
Pelham, MA

### **James Dammann**

*Treasurer*  
Hillsboro, NH

### **Fred Heyes**

*Secretary*  
Orange, MA

### **Ken Conkey**

*At-Large*  
Belchertown, MA

### **Shane Bajnoci**

North Amherst, MA

### **Phil Benjamin**

South Easton, MA

### **Mike Conway**

Oxford, MA

### **William Hull**

Pomfret Center, CT

### **Larry Lashway**

Williamsburg, MA

### **Roland Leclerc**

Belchertown, MA

### **Peter Rayton**

Northampton, MA

### **Christopher Egan**

*Executive Director*

Ms. Petion:

Thank you for the opportunity to submit comments related to the Alternative Portfolio Standard Straw Proposal issued by DOER.

Overall, we appreciate the proposed changes outlined by DOER. We believe the one-time 2% increase in the minimum standard, the increase in the ACP to a fixed price of \$40, and the gradual phase-down of natural gas CHP in the APS will all lead to an appreciation in value for Alternative Energy Credits, to the point where they once again will serve as an incentive for homeowners and businesses to switch to renewable heat. These changes are well-considered.

We have no objection to changes specific to woody biomass, including shortening the GHG reduction timeline to 20 years, as the science clearly supports the decarbonization impact of modern wood heating, and research shows modern wood heating can reach that target almost immediately.

We also don't object to the elimination of the forest-derived fraction. Most of the APS feedstock is coming from sawmill residues (which offer even greater decarbonization potential). As a result, the additional paperwork needed to satisfy the fraction is unnecessary, since the wood largely originates in the forest and benefits forest landowners from sale as sawtimber, with the residues being used for modern wood heating. There should be no negative effects resulting from the elimination of the fraction.

Thermal metering adds cost and complexity to systems. We believe that mandated metering should be limited to the largest systems, rather than reaching down to intermediate-sized systems, as the added cost will reduce the incentive to switch to renewable heat. DEP plan approval is required for boilers at a threshold of 3 MMBtu/hour, and that threshold also is used within the APS for some woody biomass regulation. We believe setting that as the level at which metering is required would make sense.

Modern wood heating systems offer multiple benefits to end-users and the Commonwealth at large – keeping heating dollars in the local economy, offering very low-cost heat compared to other renewable technologies (which can keep businesses afloat in Massachusetts, disincentivizing a move to

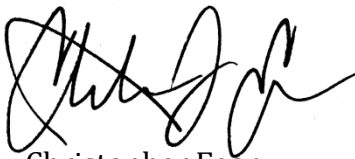
*Advocating for a Strong, Sustainable Forest Economy*

nearby lower-tax states), and reducing net carbon emissions significantly for users, who are typically switching from oil heat.

The single disadvantage is the high capital cost of systems. We believe that even beyond the APS, some rebate or tax incentive is necessary to grow this sector effectively. We were hoping that MassCEC would return to offer rebates for installation, or potentially doing so through MassSave. As a result, we're concerned about the forced choice for air-source heat pumps between the APS program and MassSave. Rather than double-dipping, such dual incentives would move the Commonwealth more speedily towards renewable heating, and we wouldn't want to see this same choice enforced for modern wood heating, should rebates return in some form. The existing 80% rebate threshold should be sufficient to protect against any issues.

Thank you for your efforts in improving the APS, and thanks again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Egan', with a stylized, cursive script.

Christopher Egan  
Executive Director