



August 13, 2021

Massachusetts Department of Energy Resources
100 Cambridge Street # 1020
Boston, MA 02114

Re: 225 CMR 16.00 Straw Proposal

Dear Sir or Madame,

Thank you for reaching out to stakeholders for input about potential adjustments to the Alternative Portfolio Standard. We will respond point by point.

Minimum Standard: We support an increase of 2% and existing .25% annual increase. However, we suggest not locking the program into a "one time" increase. Perhaps explain the increase as "an increase now". Flexibility is always useful when possible.

ACP: We support an increase in the ACP to \$40.00.

APS Eligible Technologies: We support removal of deep geothermal heat exchange, solar hot air, and compost heat exchange systems.

Natural Gas Phase Down: We support the natural gas phase down. DOER should be very clear about what constitutes "renewable fuel". Renewable energy is often subject to debate about true renewability.

Small Air and Ground Source Heat Pump Eligibility: Assessing cooling loads should also be added to heat load calculation/design submittal. At this time, cooling loads should only be used for further research about potential heat pump power consumption rather than as a threshold for eligibility data. We know that many heat pumps add new power load in use as air conditioners. Ideally, cooling loads where cooling capability will be new would be tracked and potentially offset against heating loads.

Intermediate and Large Renewable Thermal: Tarm Biomass has found that metering commercial installations in New Hampshire has been relatively easy. The cost for adding heat meters is manageable for installations of approximately 2,000,000 Btu/hr. or higher. However, attempting to net out parasitic loads, grid electricity, all cooling energy, and any heating energy from heat recover for systems below 2,000,000 Btu/hr. will be complicated and expensive. We suspect that trying to track other loads will virtually eliminate biomass applications from taking part in the program. Most sites with small heating systems do not have personnel capable of managing complicated and ongoing metering programs.

Tarm Biomass recommends considering an unmetered category for boilers under 2,000,000 Btu/hr. output. Boilers of this size category can be "metered" based on fuel input records, which are provided by receipts from delivery companies.

Woody Biomass: Tarm Biomass supports removing the 30% requirement for forest derived fuel or residues from wood products manufacturing consisting of clean wood. The 30% percentage minimum seems arbitrary from a policy perspective. If an otherwise approved system is using woody biomass completely from other sources it should be allowed under the APS and applauded. All wood sources should be allowed. There are many other regulations that protect Massachusetts and regional forests, air, and watersheds. The APS should not delve into this realm. The greatest threat to New England forests is conversion to agriculture and development, which is taking place at a rate of 60 acres per day. Wood fuel use for heating should be encouraged as a way to boost wood values and to therefore make trees more valuable. Conservation of forests cannot take place without adequate economic motivation.

Liquid Biofuels: We support the capping of AEC production from liquid biofuels at 460,000/yr. and minimum blend of 20% renewable fuel.

Renewable Thermal Size Classifications: Tarm Biomass supports the two proposed classifications. We believe the break should be at 2,000,000 Btu/hr. or higher.

Multipliers: Tarm Biomass has no comment.

Thank you once again for opening the process to stakeholder input.

Sincerely,



Scott W. Nichols, President