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August 20, 2021

Ms. Samantha Meserve
Via e-mail - DOER.APS@mass.gov
Deputy Director, Renewable and Alternative Energy Division
Massachusetts Department of Energy Resources
100 Cambridge Street, 10th Floor
Boston, MA 02114

Subject: MACOM Technology Solutions Inc. Comments on APS

Dear Ms. Meserve,

The purpose of this letter is for MACOM to provide comments on the Alternative Energy Portfolio Standard (APS) review being conducted by the Massachusetts Department of Energy Resources (DOER).

We appreciate the opportunity to provide input during this important process.

MACOM Technology Solutions Inc designs and manufactures analog radio frequency (RF), microwave, millimeter wave, and photonic semiconductor solutions. Our headquarters and primary manufacturing facility are based in Lowell, MA, where we employ over 400 employees. Our high technology semiconductor manufacturing processes in Lowell, use sophisticated equipment in class 10,000 clean rooms are energy intensive, and extremely sensitive to power disruptions.

It is MACOM's position that Combined Heating and Power (CHP) should continue to be a part of the APS program, and alternative energy certificates should not be phased out as suggested in the straw proposal. To this end, MACOM is in the process of working with Renew Energy Partners (Renew), a Massachusetts based entity, to bring a 2.65 MW CHP system with a reciprocating engine, 630 kW / 1500 kWh battery storage system, 190-ton chiller, and related equipment online before the end of this calendar year. In addition, our new system will have the ability to island, which is important from a resiliency standpoint due to poor power quality from the local utility.

This project would not have been economically viable without the benefit of the APS and alternative energy certificates (AECs) and if these credits are phased out, we will become less competitive from a business perspective. It is frustrating that we have made a decision, partly based on these available incentives, to invest in the future of Massachusetts manufacturing, only to have those incentives potentially eliminated in a short time period.

In addition to providing power resiliency and carbon emission reductions, the new CHP and its associated systems are expected to provide valuable savings, helping MACOM to be competitive while also providing construction, manufacturing and technology related jobs in a part of the Commonwealth that is economically challenged. Our expectations are to utilize the savings from the CHP project including those derived from AECs to fund further investment in technology and development of our Lowell, Massachusetts operations.

We therefore strongly urge the DOER to continue to support CHP's inclusion in the program, as well as strengthen the APS moving forward. We are available should you have any questions, and we appreciate your time and attention on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jack Kober", is written over a horizontal line.

Jack Kober
SVP & CFO
781-724-4888