



August 19, 2021

Samantha Meserve
Department of Energy Resources
100 Cambridge Street
Suite 1020
Boston, MA 02114

Dear Ms. Meserve,

We thank you for the opportunity to provide additional feedback regarding the proposed changes to the APS program. CLEAResult supports the proposed change to the APS Minimum Standard. We still believe there are some flaws in the program design that have resulted in supply and demand imbalances, causing price volatility, and creating uncertainty for project developers, owners, and operators of all technology types. While we appreciate the one-time boost, CLEAResult would also like to reiterate that a larger increase in year-over-year percentage would help to stabilize the price in the credit market.

We would also like to reiterate our support for continuing the participation of CHP in the program without the phase-out. While we recognize that some CHP uses fossil fuels and emits greenhouse gases, it is highly efficient and reduces both the carbon footprint and fuel use of a facility, when compared with heat from a traditional boiler and electricity from the grid. Since the facility produces electricity on site, CHP, like other distributed generation projects, also avoids transmission and distribution losses. Less fuel output is burned to produce both heat and electricity, therefore reducing greenhouse gas emissions, including CO₂ and other pollutants like NO_x and SO₂. CHP also displaces dirtier grid emissions and should continue to be included in the APS program until the marginal grid emissions situation reverses. Until the overall electrical grid becomes less carbon intensive, adding electrified heating may result in greater carbon emissions as it increases load. CHP technology epitomizes the purpose of the Alternative Energy Program and is a cost-effective solution to helping reduce greenhouse gas emissions to meet the State's goals.

Thank you for your time.

Sincerely,

A handwritten signature in blue ink that reads "Lisa Barrett".

Lisa Barrett

Program Manager

Clean Energy Markets