



Via: Electronic Mail

August 20th, 2021

RE: 2021 Alternative Energy Portfolio Standard Straw Proposal Comments

Dear Ms. Meserve,

Thank you for the opportunity to comment on the 2021 Alternative Energy Portfolio Standard Straw Proposal. Dandelion is supportive of many of the changes for Small Ground Source Heat Pump eligibility including the proposal to adjust the criteria relating to system design to provide greater flexibility. Dandelion's comments will focus on where the break between non-metered and metered Renewable Thermal systems should be set.

Dandelion is one of the leading residential geothermal companies in the United States. We provide high-efficiency ground source heat pumps (GSHPs) and are on a mission to make geothermal heat pumps so inexpensive and easy to install that we enable a widespread shift from fossil heating to renewables. Dandelion is in the process of expanding its operations into Massachusetts as a direct result of current and proposed changes to programs such as Mass Save and the APS.

Dandelion believes the breakpoint between "Small" and "Intermediate" GSHP systems of 134,000 BTU/h, or roughly 11 heating Tons, is too low. In New York, for example, the cutoff for prescriptive incentives for the Clean Heat program, which includes GSHPs and ASHPs, is 300,000 BTU/h or 25 tons.<sup>1</sup>

Based on Dandelion's experience installing hundreds of systems in neighboring states such as New York and Connecticut, we estimate that the current 134,000 BTU/h cap will cause 5-10% of single family homes to fall into the Intermediate category, triggering increased overhead and compliance costs which will result in fewer of these homes taking advantage of AECs.

---

<sup>1</sup> NYS Clean Heat Statewide Heat Pump Program, National Grid application, <https://www.nationalgridus.com/media/pdfs/resi-ways-to-save/ee7255-uny-electric-heat-and-products-application.pdf>

In addition, the ability for Small systems to pre-mint 10 years of credits upfront is an incredibly attractive feature. Moving to a quarterly minting schedule will further reduce the attractiveness of credits for single family homes that fall into the Intermediate category.

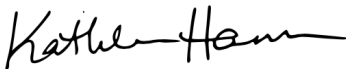
Dandelion believes that the Small category should be high enough to encompass any single family residential home that wishes to go GSHP. Dandelion recommends the following changes to Small and Intermediate system classifications:

- 1. All single family homes, regardless of size, should be classified as “Small”**
- 2. In the event that a break between Small and Intermediate for single family homes must exist:**
  - a. The break should be at least 15 heating tons, or 180,000 BTU/h.**
  - b. DOER should give single family homes larger than 180,000 BTU/h the option to apply under the “Small” classification and set a maximum incentive threshold for these homes.** This would mirror the way in which Mass Save incentives for GSHPs work where per-ton incentives stop after a certain system size is hit.

As always, Dandelion thanks DOER for the opportunity to provide comments and for soliciting feedback from stakeholders to improve the APS.

Dandelion was encouraged by other changes to the program such as the minimum standard increase and proposed ACP increase. As mentioned above, Dandelion is also highly supportive of the decision to adjust the criteria relating to system design for Small GSHPs to provide greater flexibility. This will encourage innovation and ultimately allow Dandelion and other installers to bring down costs for homeowners. Dandelion looks forward to further participation in the future.

Sincerely,



Kathy Hannun

President and Co-Founder

Dandelion

###