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August 20, 2021

Massachusetts Department of Energy Resources  
Attn: Darchelle Petion  
100 Cambridge St.  
Suite 1020  
Boston, MA 02114

**RE: APS Straw Proposal Comments**

Global Partners LP (Global), headquartered in Massachusetts, is one of the largest independent owners, suppliers and operators of gasoline stations and convenience stores in the Northeast. Global also owns, controls or has access to one of the largest terminal networks in New England and New York, through which it distributes gasoline, distillates, residual oil and renewable fuels to wholesalers, retailers and commercial customers. In addition, Global engages in the transportation of petroleum products and renewable fuels by rail from the mid-continental U.S. and Canada. In total, Global owns, leases, or maintains storage at twenty-six liquid fuel product terminals, owns, leases or supplies approximately 1,560 gas stations, and has daily sales of approximately 360,000 barrels of liquid fuel products. Global, a third-generation family led company, has been in operation for almost ninety years and trades on the New York Stock Exchange under the ticker symbol "GLP." As such, we are uniquely situated to comment on liquid energy markets and respectfully submit our comments below.

Massachusetts Department of Energy Resources (DOER) recently proposed changes to its Alternative Energy Portfolio Standard (APS). Several of these proposed changes impact APS Eligible Liquid Biofuels. DOER requested comments concerning their proposed changes including the minimum biofuel blend percentage, feedstock eligibility, and how these proposed changes impact low income equity.

The APS Straw Proposal proposes an increase in the biofuel portion of home heating fuel from ten percent to twenty percent. Industry has generally adopted a twenty percent blend (B20) standard and continues to progress to displace petroleum with low carbon renewable liquid heating fuels—a move we wholly support. We agree that twenty percent is an appropriate minimum standard for APS participation and will not pose challenges for suppliers. Our assets are equipped to procure, store, and supply Eligible Liquid Biofuels (as defined in the APS Straw Proposal) to accommodate participation by downstream retail dealers.

Concerning feedstocks for Eligible Liquid Biofuels, we believe that APS feedstock eligibility is too limited. Currently, Eligible Liquid Biofuels can only be produced from organic waste feedstocks such as waste vegetable oils, waste animal fats, or grease trap waste. This definition prevents market entry for many other sustainable sources of biofuel. Environmental Protection Agency's (EPA) Renewable Fuel Standard program (RFS) has broader feedstock eligibility and has analyzed biofuels lifecycle impacts on GHG emissions. The biomass-based diesel category GHG emissions reductions meet or exceed fifty percent

relative to petroleum-based products. Mirroring eligibility for biofuels to the RFS would provide additional liquidity to sustainable fuel markets to provide customers with as many options as possible. We believe optionality results in greater competition and thus lower prices, which would help meet 2021 APS Goals of prioritizing the most GHG emission reductions for the least cost. Developments from other public policies are driving biofuel sustainability improvement and Massachusetts can take advantage from these other programs to procure increasingly sustainable biofuels<sup>1</sup>. This would also minimize the administrative burden on the Commonwealth. Finally, permitting co-mingling of biofuels of various feedstocks and retaining a book inventory of product will allow for more efficient use of tankage to make more product available to customers. This supply efficiency should also help drive additional cost savings to customer.

DOER also requested comment on low income equity. Global believes that lowering the APS participation percentage cap from twenty percent to fourteen percent for Eligible Liquid Biofuels decreases the ability for a greater range of stakeholders to benefit from the program. As DOER notes, biofuels enable the use of existing infrastructure to decrease emissions without costly capital investments. Massachusetts is a relatively prosperous state, however, not everyone can afford expensive retrofits and equipment. Enabling existing infrastructure utilization in this case will build on the benefits from increasingly cleaner petroleum-based fuels (Ultra Low Sulfur Diesel) and result in additional co-benefits such as decreased exposure to air toxins and other harmful emissions, which will enhance environmental justice efforts in the Commonwealth of Massachusetts. In fact, biodiesel is a Clean Air Choice by The American Lung Association<sup>2</sup>. One comprehensive study, conducted by the National Biodiesel Board, found that B100 Bioheat® use would result in 4,000 fewer asthma attacks, 6,000 fewer restricted-activity days, and 1,000 fewer lost work days in the Boston area alone<sup>3</sup>. In short, providing incentives to help industry continue its transition would be helpful toward achieving low income equity and improving environmental justice outcomes in Massachusetts.

Global Partners LP appreciates the opportunity to provide comments and looks forward to continuing to work with DOER staff on the successful growth and implementation of the APS program.

Please feel free to contact me at (781) 483-2649 or [jonathan.hackett@globalp.com](mailto:jonathan.hackett@globalp.com) with any questions regarding these comments.

Cordially,

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Renewable Fuels Strategist  
Global Partners LP

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<sup>1</sup> Popkin, Gabriel. "Planting Crops — and Carbon, Too." *The Washington Post*, 22 Jan. 2021, [www.washingtonpost.com/graphics/2021/climate-solutions/climate-regenerative-agriculture/](http://www.washingtonpost.com/graphics/2021/climate-solutions/climate-regenerative-agriculture/).

<sup>2</sup> "Biodiesel." *Clear Air Choice*, The American Lung Association, 2021, [www.cleanairchoice.org/clean-fuels/biodiesel/](http://www.cleanairchoice.org/clean-fuels/biodiesel/).

<sup>3</sup> *How Biodiesel Can Improve Boston's Health*. National Biodiesel Board, 2021, [mybioheat.com/wp-content/uploads/2021/06/nbb-2021-trinity-boston.pdf](http://mybioheat.com/wp-content/uploads/2021/06/nbb-2021-trinity-boston.pdf).