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August 19, 2021

Department of Energy Resources, ("DOER")

Attn: Darchelle Petion

100 Cambridge Street, Suite 1020

Boston, MA 02114

RE: APS Straw Proposal Comments

Dear Sir or Madam,

Twin Rivers Technologies Manufacturing Corporation, ("TRT"), is pleased to present comments regarding the Massachusetts Department of Energy Resources (DOER) Straw Proposal for changes to the Alternative Energy Portfolio Standard, ("APS"), program. TRT believes that opportunities to participate in the review and revision process of existing programs that are administered by the Commonwealth of Massachusetts is an opportunity to help the public and a responsibility of all businesses. TRT is a member of the CHP Coalition and supports all the Massachusetts CHP Coalition's comments and views on this matter.

In the case of the APS, TRT recognizes that the program has overall had positive results that have facilitated a change to cleaner fuels; development of new projects and alternative energy systems that have helped to reduce emissions throughout the Commonwealth. The APS has brought about the development of many new power sources that have augmented the ability of the grid to supply power to the Commonwealth, specifically by combined heat and power, ("CHP"), systems. At TRT, the APS facilitated the installation of the CHP produce electricity and steam at our facility shifting us away from heavy oils to natural gas and subsequent reductions in emissions as well. This successful project has aligned TRT with the

overall goals of the APS program to reduce greenhouse gas emissions; provide market stability and provide complementary policies to those ends. At the time of its inception, the APS program helped to make TRT's CHP system an affordable and attractive development project. TRT selected the CHP over other alternative energy projects (combined solar and wind) being assessed at the time in large part due to the value of the AECs. Our assessments took into consideration the utility of the CHP; its cost; its depreciation over time and the inclusion of the AECs to allow a sufficient return on investment and positive future economic operations. Understanding at the time that the AECs might be short lived would have changed the results of that assessment and potentially may have led to other conclusions and technology choices.

Proposed modifications to the APS program will negatively impact businesses like TRT, which took great financial risk to install these systems. Our hope is that the DOER will modify this proposal to make the balance of the modifications positive to all involved. To that end, TRT proposes the following changes to the APS Straw Proposal:

1. The DOER define the useful life of a CHPs operation at each design threshold;
2. Existing CHP systems that have been installed under the AEC program be allowed to:
 - a. Continue to participate fully until the unit reaches its useful life of operation; and / or
 - b. Until the emissions performance of the CHP is less than that of the emissions performance of the electrical grid energy supply in Massachusetts;
3. All CHP units that convert to renewable natural gas, ("RNG"), be allowed to:
 - a. Continue to participate beyond their defined useful life;
 - b. Be granted full participation in the AEC during the assessment, permitting, development and installation process;
 - c. All CHP units that convert to RNG be allowed to collect renewable energy credits, (REC), through other similar programs sponsored by the Commonwealth;

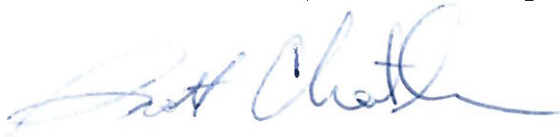
Twin Rivers Technologies Manufacturing Corporation considers the Alternative Energy Portfolio Standard program critically important and is hopeful that the DOER will take the above comments into consideration. When we entered into this program with the DOER we did so in good faith trusting that the Commonwealth would uphold the commitment it made to its participants. We continue to believe that this is the case and look forward to working with your offices to reach conclusions that are mutually beneficial and support the goals of reducing greenhouse gas emissions, providing market stability and creating complementary policies that benefit the Commonwealth. In that spirit, TRT strongly opposes the removal or reduction of AECs for CHP systems that continue to provide cleaner energy within the supply grid than that of most energy providers.

We appreciate this process to examine the AEC system and take into consideration those comments made to DOER by all the participants that made the original ASP program successful and the real cost of those commitments by those organizations. Only in this way can we reach a point that the APS program fairly supports all involved to recover their investments in clean energy under the program.

If you have any questions or need additional information, please contact Michael Glinski, Regulatory Affairs Manager – TRT at 617-472-9200 ext. 4284. Thank you for your consideration.

Best regards,

Twin Rivers Technologies Manufacturing Corporation



Scott Chatlin,

President and CEO