



November 30, 2017

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

**RE: Comments on the APS Guideline on Biomass, Biogas, and Biofuels for Eligible Renewable Thermal Generation Units; and the APS Program**

The Massachusetts Energy Marketers Association, (MEMA), established in 1955, is the state trade association for the heating oil industry. Our collective membership includes retail heating oil marketers, wholesale suppliers of heating oil to the six New England states, home and commercial heating oil equipment manufacturers and distributors, and producers and suppliers of liquid biofuels.

On behalf of the undersigned members of MEMA's Board of Directors, I submit the following comments to the Massachusetts Department of Energy Resources (DOER) on the draft Alternative Portfolio Standard (APS) **Guideline on Biomass, Biogas, and Biofuels for Eligible Renewable Thermal Generation Units** as it relates to **225 CMR 16.00 – Alternative Energy Portfolio Standard**.

- We request that DOER retain all of Section 5. Greenhouse Gas Reduction.

MEMA's Board of Directors would also like to restate its strong support for allowing the use of all advanced biofuels as defined under the federal Environmental Protection Agency's (EPA) Renewable Fuel Standard (RFS) – including soy-based biofuels – in the Massachusetts APS program for eligible liquid biofuels.

As stated in our testimony submitted to DOER in June 2016 and July 2017, and in tandem with testimony submitted from other notable stakeholders including the National Biodiesel Board and Massachusetts-based World Energy, following sophisticated analysis and data development the EPA implemented the RFS years ago and defined advanced biofuels as those that reduce life cycle greenhouse gas emissions by 50% or more. These advanced biofuels include soybean oil. (See attached EPA document for Approved Pathways for Renewable Fuel – letter H.)

By accepting and referencing the RFS, DOER needs to be in harmony with federal regulations as it relates to advanced biofuels and biomass-based diesel.

Currently, many of our retail members utilize soy-based biofuel blended with ultra-low sulfur heating oil. All our wholesale members – who supply Massachusetts with nearly 900 million gallons of heating oil annually – are purchasing and blending an array of advanced biofuels at their terminals including soy-based biofuel. And finally, most of the biofuel producers and suppliers to the Massachusetts marketplace are utilizing multiple advanced biofuel feedstocks including soy.

DOER must work to ensure that Massachusetts has a comprehensive, well-run APS program that allows for a competitive marketplace for all retail heating oil companies, wholesale operations and biofuel producers and suppliers. In doing so, DOER will ensure that the Commonwealth is getting the broadest array of biofuels that have been vetted for environmental benefit by the federal government.

Respectfully Submitted,

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Page 3 of 3

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See attachment: EPA Approved Pathways for Renewable Fuel

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