

**Clean Heat Standard**  
**2023 Initial Written Stakeholder Comments**  
**On the Draft Program Framework**  
**September-December 2023**

In November 2023, MassDEP released a draft program framework for the Clean Heat Standard and requested stakeholder feedback on the framework by December 21, 2023. MassDEP held a technical session and two virtual community meetings on the framework in early December 2023. Below, MassDEP has summarized high level themes from the comments received between September 2 and February 9, 2024.

Copies of all comments received during this time have been posted on the [CHS webpage](#)<sup>1</sup>, along with copies of comments received earlier in 2023 and accompanying summaries. Additional comments may be submitted at any time to [climate.strategies@mass.gov](mailto:climate.strategies@mass.gov).

### **Setting the Standard**

Commenters recommended that the standards be set to achieve net zero emissions in 2050 (MCSE, NEHPBA). One commenter emphasized that the standards should be set to ensure predictability for heating energy suppliers to reduce the costs passed on to consumers (PowerOptions) while another argued compliance obligations should be set three years in advance on a rolling basis rather than based on annual emissions or electricity sales data (Energy Solutions). Commenters also suggested the standard should 1) be set as a carbon intensity target for the heating sector (ABC); 2) be based on verified lifecycle greenhouse gas (GHG) emissions using the GREET model (National Grid); and 3) include the industrial sector along with the residential and commercial sectors (EDF). One commenter suggested that the timing of the CHS compliance obligation should be milestone-based to match the rollout of renewable energy infrastructure (Lowell General Hospital). Another commenter argued that the compliance obligation does not need to persist indefinitely (PAs). Commenters requested additional information on the quantitative analysis used to determine the CHS requirements (Acadia Center, National Grid).

*Full Electrification Standard:* Many commenters were expressly supportive of the full electrification requirement concept (Acadia Center, Boston, CLF et al.) and many suggested that an equivalent of the full electrification requirement should be developed for commercial and industrial buildings (Acadia Center, CLF et al.). Many commenters requested clarification on how the CHS will impact the pace of electrification (CLF et al.), while another suggested that the targets in the CHS should be consistent with the targets set in the Mass Save program (Eversource).

*Equity carve-out:* Many commenters suggested that MassDEP consider expanding the scope of households that would qualify for the equity carve-out, such as by including moderate-income

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<sup>1</sup> See MassDEP's website for recordings and slides from past CHS stakeholder meetings: <https://www.mass.gov/lists/past-clean-heat-standard-meeting-materials>

households (CLF et al., EDF), using geographic identifiers as opposed to solely income-based identifiers (Energy Solutions, NEEEC, NEEP), or including residents of large multifamily buildings served by commercial meters (Eversource). One commenter noted that using geographic definitions for the equity carve-out would help with the administrative burden of income verification, particularly with handling personal identifiable information (Energy Solutions). Another commenter identified eligibility for low-income electricity rates as a good preliminary screening tool, but suggested MassDEP track mechanisms used in other programs, such as Mass Save (Boston).

In terms of the size of the equity carve-out, one commenter requested that MassDEP increase the equity carve-out to match the percentage specified in the appendix to the 2050 Clean Energy and Climate Plan (NEEP) whereas another requested that a specific target for the equity carve-out not be set until the CHS has a mechanism in place to address the increased operational costs of air-source heat pumps compared to natural gas heating systems (The Low-Income Network). Similarly, another commenter suggested that MassDEP consider whether eligibility for the equity carve-out should include protections from increased energy bills or tenant protections for renters (Energy Solutions). Another commenter generally supported pairing the equity carve out with financial support for low-income consumers and tenants (Boston).

*Emission Reduction Standard:* Several commenters addressed the stringency and timing of the emission reduction requirements, noting that 1) there should be a ramp up period rather than a flat annual increase (NEEP); 2) the standard should be set with reference to a comparative emission inventory (ABC); 3) the standard is not aggressive enough to achieve the 2030 sublimit (Acadia Center); and 4) the emission reduction requirement will be impossible to meet if the CHS focuses only on space heating (EDF).

### **Regulated Heating Energy Suppliers**

*Electricity suppliers:* Several commenters discussed the way the compliance obligation shifts from fuel suppliers to the electric sector over time. Specifically, one commenter acknowledged the value of including an obligation on the electric sector but suggested that the transition onto the electric sector should happen more slowly through the 2030s (EDF). Another commenter suggested that the electricity sector should not have a compliance obligation until the price gap between electricity and fossil fuels is closed on a dollar per British thermal unit (Btu) basis (Acadia Center). A few commenters suggested that the compliance obligation on the electricity sector should be based on sales to residential customers only (MMWEC, WBMLP).

Some commenters opposed inclusion of any compliance obligation on electricity suppliers (ABC, Boston, WBMLP) while many others asked MassDEP to provide additional rationale for the inclusion of electricity suppliers as obligated entities, including the decision to regulate retail sellers of electricity rather than distribution companies (CLF et al.). Many commenters emphasized that raising the price of electricity is counterproductive to building electrification (ABC, CLF et al., Eversource, GBPSR, Zellman) and one requested MassDEP closely monitor electric rates during CHS implementation (Rewiring America).

*Municipal Light Plants:* Several commenters questioned whether MassDEP has the legal authority to include municipal light plants (MLPs) in the CHS (MMWEC, MEAM, WBMLP, WG+E). One commenter

noted that including a compliance obligation for MLPs will fill an existing policy gap not currently addressed through the Mass Save program (PAs).

*Delivered fuels:* As with including MLPs, one commenter noted that placing a compliance obligation on delivered heating fuels will fill an existing policy gap (PAs). Another commenter argued that more of the total compliance obligation should fall on fossil fuel suppliers relative to electricity suppliers (EDF). A third commenter argued that propane suppliers should not be regulated under the CHS (Propane Plus). Several commenters raised concerns about the limited options available to natural gas companies to meet their obligations under the CHS (EDF, National Grid). Another commenter suggested that delivered fuel companies may struggle to compete with utilities with large existing electrification programs (NEEP). One group of commenters noted that the compliance obligation on the natural gas sector is based only on carbon dioxide emissions, rather than more comprehensive GHG emissions, such as methane from pipeline leaks (The Low-Income Network).

### **Credit Generation**

*Full electrification credits:* Commenters were divided on how to handle fossil fuel backup heating systems for full electrification projects and fell into the following categories: 1) fossil fuel backups should be allowed (Duclos); 2) fossil fuel backups should not be allowed (CLF et al.); and 3) fossil fuel backups should only be allowed if there is a mechanism to verify use of the heat pump for heating in place (Acadia Center). Many commenters suggested that other non-combustion appliances, such as heat pump water heaters, induction stoves, and clothes driers, should be a criterion for receiving full electrification credits (Boston, CLF et al.). Another commenter stressed that MassDEP should clarify that early action full electrification projects would generate emission reduction credits once the CHS is implemented (Acadia Center).

*Emission reduction credits:* The framework discusses generating emission reduction credits for operating heat pumps and using eligible liquid biofuels. Many commenters raised concerns with the simplifying assumption of assigning 5 metric tons (MT) of emission reduction credits to each residence regardless of size (Acadia Center, ABC, CLF et al., EDF, Global, NEEP) and requested that the additional quantitative analysis used to evaluate the 5MT per residence assumption be shared with stakeholders (Acadia Center, CLF et al.). One commenter suggested that credits should be generated according to actual emissions reduced by each clean heat measure (National Grid) and another that data collected through Mass Save (i.e., on weatherization) should be used to inform emission reduction credit values (Boston). Many commenters also argued that MassDEP should not ignore the carbon intensity of electricity generation (Adamsky, Albrecht, Cornett, 250+ propane users, 400+ small businesses, Global, Maraveilas, NEHPBA, Suburban). For biofuels, one commenter supported the approach to biofuel crediting laid out in the framework (NBI). Another commenter noted that B5 (5% biodiesel) is not an appropriate baseline for heating oil carbon intensity because blending is discretionary (Global). Several commenters argued that biofuels should not be credited as fully displacing emissions from equivalent volumes of heating oil because they are not zero emission fuels (Acadia Center, PFPI).

*Determination of eligibility:* As in previous rounds of stakeholder comments, many commenters argued that the CHS should be technology neutral and include a broad array of technologies and fuels that reduce emissions (Ameresco, ABC, AIM, Clean Energy, Eversource, Global, Milton CAT, NE CHPA, Oberon, Pioneer Oil & Propane, Propane Plus, Senator O'Connor, Suburban, Surner Heating, Tasse Fuel, Vicinity,

WG+E). Many other commenters specifically supported the electrification goals of the CHS (Acadia Center, CLF et al.) and some argued the CHS should only include non-combustion technologies (GTA, PFPI). One commenter suggested that MassDEP consider using only one type of credit based on actual GHG reductions for each measure while maintaining the equity carve out and full electrification goal in the framework (NEEP). Another suggested using a credit system based on the SMART program, where projects receive credit adders and detractors based on project features (Boston).

Commenters were also divided on when and how MassDEP should evaluate additional fuels and technologies. Commenters generally agreed that lifecycle GHG emissions should be part of the consideration of fuel eligibility (Albrecht, CLF et al., EDF, 2500+ homeowners, Maravelias). Many commenters identified metrics beyond lifecycle GHG emissions that MassDEP should include in the evaluation of technologies and fuels, including cost (CLF et al.), scalability (CLF et al.), local air quality impacts (CLF et al., GBPSR), other environmental and/or social harms (EDF), health impacts (GBPSR), and consistency with the Commonwealth's infrastructure transition strategy (Acadia Center). Conversely, one commenter argued that MassDEP should not consider fuel availability or exclude fuels that are produced in line with existing air pollution requirements when evaluating eligibility (Ameresco). Another group of commenters argued MassDEP should credit more affordable home heating options (Adamsky, Cornett, 400+ small businesses).

Several commenters addressed how often MassDEP should evaluate eligibility of different fuels and technologies. Some commenters suggested that MassDEP should consider adding additional fuels to the CHS earlier than 2028 (Ameresco, Vicinity) and reevaluate fuel eligibility more frequently than the suggested 5-year program review schedule (Eversource), while another argued MassDEP should not consider allowing additional fuels into the program in 2028 (GTA).

*Fuels and Technologies:* Commenters expressed the following opinions on specific technologies and fuels:

Weatherization/thermal enclosure improvements: Several commenters suggested that weatherization and energy efficiency measures should generate credits in the CHS (Ameresco, Boston, EDF, GTA) or be included as a requirement for earning credits from a heat pump (Boston, NEEP). One commenter emphasized the need to avoid wasted heat in buildings and suggesting using existing measures such as the Home Energy Rating Index (HERS) (Duclos).

Hybrid heating systems: Commenters requested that hybrid heating systems be required to meet the same cold climate air source heat pump requirements that the full electrification systems are required to meet (Acadia Center) and noted that inclusion of hybrid heating systems adds complexity to the CHS without a clear program benefit (NEEEC).

Water heaters: Many commenters suggested that electrification of water heating should be eligible for crediting (Acadia Center, CLF et al., Energy Solutions, EDF, Duclos, GBPSR, NEEEC, NEEP, Rewiring America). Many of those commenters also supported including crediting for clothes driers and cooking appliances (CLF et al., EDF, GBPSR).

Liquid biofuels: Commenters expressed a wide range of opinions on crediting for biofuels in the CHS. Some commenters generically supported including all biofuels that reduce GHG emissions from the start of the CHS (ABC, Milton CAT, NE CHPA, Oberon), while others identified specific categories of

biofuels that should be credited, including: all Renewable Fuel Standard-eligible fuels (Ameresco), Bioheat (50+ residents, 2500+ homeowners, Senator O'Connor), waste-based liquid biofuels (Flat Rock Farm), and LR100 biogenic fuel (Vicinity). Conversely, some commenters focused comments on what types of biofuels should be excluded from crediting, including: all biofuels (GTA), liquid biofuels derived from wood, wood waste, or mixed municipal solid waste (PFPI), liquid biofuels that are not eligible for the Alternative Portfolio Standard (Acadia Center), biofuels derived from new sources (EDF), and any biofuels that produce significant adverse local air pollution impacts or any other substantial environmental and/or social harms (EDF).

Many commenters expressed concern with the uncertainty around the lifecycle emissions associated with biofuels (Acadia Center, CLF et al., PFPI) and requested additional information on how MassDEP would handle biofuels in the CHS (Acadia Center, CLF et al.). Several commenters questioned why biofuels would only be eligible for crediting through 2030 (Ameresco, Oberon). Finally, one commenter suggested that there should be a cap on the amount of credits that can be generated from biofuels (EDF).

Renewable gaseous fuels: Many commenters argued that MassDEP should credit renewable gaseous fuels (Ameresco, ABC, APGA, Clean Energy, RNG Coalition, Electrochaea, Milton CAT, National Grid, NE CHPA, NEHPBA, Oberon, Vanguard, Vergent). Some pointed out that allowing crediting for renewable natural gas would incentivize the anaerobic digestion market, in line with MassDEP's Solid Waste Master Plan (RNG Coalition, Divert, GLSD, NEBRA,), whereas others emphasized that renewable gaseous fuels, including hydrogen, could serve as transitional fuels and support hard-to-electrify end-uses (A Better City, RNG Coalition, GLSD, NEBRA). Many commenters specifically identified hydrogen as a renewable gaseous fuel that should be supported in the CHS (Ameresco, ABC, APGA, MCSE, Milton CAT, NE CHPA, NEHPBA,). Conversely, several commenters emphasized their support for the exclusion of renewable natural gas and hydrogen (Acadia Center, GTA).

One commenter expressed support for crediting use of efficient natural gas fueled boilers (Lowell General Hospital), while others emphasized that natural gas is an important, affordable, and reliable energy source (APGA, WG+E). Other commenters supported natural gas fireplaces as a backup heating source (400+ small businesses, NEHPBA).

Commenters were divided on the topic of propane, with some arguing for crediting both conventional and renewable propane (250+ propane users, Lin's Propane, Lowell General Hospital, Plissey, Pioneer Oil & Propane, Propane Plus, Sumner Heating, Tasse Fuel), others supporting crediting renewable propane (Maravelias, Oberon), and many others opposing crediting all propane (CLF et al., GTA).

Biomass and advanced wood heating: Some commenters supported crediting biomass generally (Adamsky, Cornett, NEHPBA). Many commenters argued that advanced wood heating should be credited in the CHS (Cary, Cox, Flat Rock Farm, Good Wood Coalition, Lignetics, Maine Energy Systems, PFI) and emphasized its affordability (Curylo, Maine Energy Systems), waste-based feedstocks (Cary, Flat Rock Farm, Good Wood Coalition, Lignetics, PFI), advantages in rural areas (Cox, Good Wood Coalition), and reduced air pollution when compared to heating oil or older wood heating systems (Cary, Flat Rock Farm, Good Wood Coalition, Maine Energy Systems). Conversely, one commenter expressly supported exclusion of all biomass from crediting in the CHS (PFPI).

Another commenter argued that because the CHS would not directly impact the price of wood (because there is no compliance obligation on wood), it could cause a spike in wood used for space heating, and requested the CHS include guardrails to avoid such an increase (Acadia Center),

Other: Several commenters supported crediting for combined heat and power (CHP) systems (Lowell General Hospital, Milton CAT, NE CHPA), with one emphasizing its role as a transitional fuel in initial years of the program (A Better City). Another commenter specifically supported inclusion of carbon-free thermal energy distributed by a district energy system for non-residential commercial buildings and industrial scale heat pumps and electric boilers (Vicinity). Commenters also emphasized support for the inclusion of geothermal (Maravelias), fuel cell plants (Lowell General Hospital), and solar (Maravelias, Zellman). One commenter suggested the CHS should support community battery storage systems, collective costs of networked geothermal and microgrids, electrification projects identified by DPU, and electric distribution infrastructure (Boston). Finally, one commenter asked MassDEP to clarify how district energy systems, such as networked geothermal, will be handled in the voluntary early registration program (A Better City).

*Verification:* Several commenters emphasized the importance of verification of program requirements in the CHS (A Better City, Energy Solutions) and provided the following specific recommendations:

- MassDEP should publish best practice guidelines for third-party verification of CHS credits, including equity verification, in the regulatory language for the voluntary early registration program and consider publishing a list of pre-vetted third-party verifiers (A Better City).
- Installation verification measures should align with Mass Save to avoid confusion and administrative burden (Eversource).
- Full electrification should allow modest use of fossil backups to avoid short cycling, address peak load, and provide emergency backup, which could be verified with fuel use data (Duclos).
- If electricity consumption data is used to verify hybrid system use, it should be used to calculate actual emissions reductions (CLF et al.).
- The same verification process used for hybrid systems should be implemented for full electrification systems that retain fossil fuel backups (Acadia Center).
- Direct biogenic content measurements following ASTM D6866 method B should be used to validate credit generation for biofuels (BETA).

*Clean Heat and Emissions Tracking System:* One commenter requested additional information on where and how the credits will be monetized, tracked, and reported (NEEEEC). Another commenter suggested that MassDEP consider a statewide energy usage database for customer targeting and income verification, and think about how the CHS will interact with the Building Decarbonization Clearinghouse (Energy Solutions). One commenter requested that the Clean Heat and Emissions Tracking System (CHETS) be published online and publicly accessible as well as able to integrate with data from existing programs, such as BERDO 2.0 (A Better City). Another commenter suggested that CHETS should allow third parties to develop software tools that can integrate with CHETS and allow aggregators to manage multiple project registration, credit generation, and credit transfer activities within a single CHETS

account (SRECTrade). Finally, one commenter suggested that the existing M-RETS tracking system for renewable thermal certificates could facilitate tracking of renewable gaseous fuels in CHS (M-RETS).

*Credit ownership:* One commenter suggested that the party obligated to deliver the clean heat measures should receive the credit initially for both biofuels and electrification (NEEP), and another noted that assigning credit ownership to homeowners would be cumbersome and require property owners to develop technical knowledge about the CHS (ABC).

## **Compliance Flexibility and Revenue**

*Alternative Compliance Payments:* Several commenters requested that MassDEP share additional quantitative analysis around how the alternative compliance payment (ACP) levels were set (Acadia Center, National Grid). One commenter specifically supported the \$190/MT CO<sub>2</sub>e ACP rate for emission reduction credits (Acadia Center), whereas another argued that the \$6,000/residence ACP for full electrification credits is too low (EDF). One commenter suggested that MassDEP consider placing a limit on how much compliance can occur via ACP (Acadia Center), and another argued that the CHS should not allow alternative compliance payments at all (Maravelias). One commenter suggested there should be a mechanism to allow for ACP level adjustment in future years based on the actual cost of electrification (EDF).

Many commenters requested additional information on the administration and allocation of ACP funds (CLF et al., Energy Solutions). Several provided specific recommendations, including 1) ACP funds should go to a dedicated fund to ensure they do not revert to the General Fund, and disbursements from the fund should be published annually online (A Better City); and 2) any ACPs made by MLPs should be used to assist programs in that MLP's service area (MMWEC, MEAM).

*Mass Save:* Many commenters addressed potential interactions and alignment with the existing Mass Save program and specifically noted:

- Further clarification is needed to ensure the CHS does not conflict with the statutory mandates behind Mass Save, including the emission reductions targets set by the Secretary of EOEEA (National Grid).
- Full electrification credits for customers who already have access to Mass Save rebates will create customer confusion and unnecessary complexity (PAs).
- A mechanism is needed to ensure the maximum value of other incentives, including Mass Save, is extracted (Duclos).
- The Mass Save Program Administrators should be able to sell and earn clean heat credits to offset program costs instead of allocating those credits to retail suppliers (Eversource).
- The equity carve-out targets should coordinate with implementation of the existing Mass Save program (The Low-Income Network).
- Weatherization could be reported in a similar way to heat pump installations for utilities subject to Mass Save and the CHS (NEEP).

- Competitive suppliers selling in municipal aggregation programs should receive a share of Mass Save electrification credits (Boston).

*Weatherization, credit banking, and other programs:* One commenter argued that weather normalization adds unnecessary complexity to the CHS (Energy Solutions), and another suggested that weather normalization should adjust electrification credit values up in colder winters and down in more mild winters (EDF). On credit banking, one commenter suggested that there should be a cap on the amount of the compliance obligation that can be met using banked credits (EDF). Commenters raised concerns about how the CHS will coordinate with existing and upcoming state and federal plans, such as Mass Save, federal tax credits, the Department of Public Utilities' 20-80 docket, and the 10-municipality pilot program (A Better City, Eversource, NEEEC, WG+E), with some suggesting that the Commonwealth should proceed with distribution of federal funds from the Inflation Reduction Act before implementing the CHS (MEAM, WBMLP). Finally, some commenters argued that clean heat credits generated in municipal service territories should be required to be sold back to the utility in that service territory (MMWEC, MEAM).

### **Equity Measures**

Commenters raised concerns about operational affordability for customers switching from natural gas heating to electric heat pumps (Duclos, The Low-Income Network, NEEEC, PowerOptions), and one suggested creating a customer targeting methodology to proactively avoid bill increase (NEEEEC). Many commenters also emphasized the need for any assistance offered to customers, such as bill assistance or up-front incentives, to be user-friendly and include automatic enrollment for qualifying customers (CLF et al.). Many commenters were generally supportive of the just transition fee concept but noted that any mechanism redistributing funds from customers receiving electrification should charge as much or more to liquid fuel customers (CLF et al.), and that MassDEP should provide more information around the decision to only apply the just transition fee to full electrification credits, and not emission reduction credits for biofuels (Acadia Center).

### **Economic Impacts**

Many commenters raised concerns around costs (Blais, 250+ propane users, 400+ small businesses, Global, MMWEC, WG+E), including implications for building new affordable homes (AIM, MCSE), costs of heat pump installations for homeowners (Cox, Lapham, WG+E), and increased operational costs and energy burdens (CLF et al., The Low-Income Network, Plissey, PowerOptions, WG+E). Commenters also specifically asked for additional data and analysis on 1) cost benefits to LMI consumers (CLF et al.); 2) cost impact studies for MLPs (MMWEC, WBMLP); 3) additional fuel costs and costs passed on to end users (Duclos, Global, MCSE, NEHPBA); and 4) loss of customer base for retail energy marketers (Global).

### **Alternate Policies**

Several commenters suggested alternative policies, including carbon pricing mechanisms, as follows: 1) a surcharge on fossil fuels with most or all revenue directed to LMI customers (PAs); 2) a simple, less costly to administer carbon pricing methodology on delivered fuels (WBMLP); 3) a 5% fee on fossil fuels used within the state used to fund a discount electrification utility rate and expand existing Mass Save and



MassCEC programs (NEEEEC); and 4) a portfolio standard that does not include a tradable credit market (Eversource).

In addition to alternative policies, commenters identified several complimentary policies, including implementation of an all-electric or heat pump electric rate (PowerOptions, Zellman), an appliance standard for heat pump water heaters (NEEP), and a focus on climate adaptation efforts instead of green energy (Horowitz).

## **Other**

Many commenters discussed concerns about the ability of the electric grid to support widespread electrification (Duclos, Maravelias, MMWEC, Senator O'Connor) and made the following specific suggestions: 1) implementation of the CHS should be delayed until the electric grid is supplied by carbon-free resources (MMWEC); 2) MassDEP should account for transmission and distribution line losses when considering grid impacts of electrification (Albrecht); and 3) MassDEP should consider the grid generators that will be retired between now and 2050 when considering the capacity of the electric grid and grid reliability (Lowell General Hospital). Commenters also expressed concerns about impacts on small businesses (Adamsky, Plissey, Propane Plus) and the workforce issues (National Grid, Senator O'Connor). Commenters raised concerns about heat pump performance in cold climates (Albrecht, Belkin) and environmental impacts of heat pump disposal (Belkin). One commenter suggested that electrification projects should be sequenced based on the greatest operational cost savings (Rewiring America). One commenter expressed general support for maintaining propane fuel in their home (Hislop). Finally, a form letter requested that the CHS exempt all households that have a propane backup generator (250+ propane users).

Commenters identified the following areas where additional attention is needed: 1) challenges customers will face when trying to engage in the credit market (PAs); 2) barriers to electrification unique to multifamily housing (The Low-Income Network); and 3) clear guidelines, roles, and processes for aggregators to support the CHS (SRECTrade).

Several commenters requested additional time to provide written comments (AIM, MCSE, NEHPBA). MassDEP also received two comments before the framework was released but after the prior comment deadline. Both of those commenters (EDF, Propane Plus) submitted new comments after the release of the framework, which have been included in this summary. Their earlier comments have been included in the PDF of comments received but have not been summarized here.

## List of Commenters

- A Better City
- Acadia Center
- Adamsky, Beverly (Adamsky)
- Albrecht, Raymond (Albrecht)
- Ameresco, Inc. (Ameresco)
- American Biogas Council (ABC)
- American Public Gas Association (APGA)
- Associated Industries of Massachusetts (AIM)
- Belkin, Carla (Belkin)
- Beta Analytic Testing Laboratory (BETA)
- Blais, Michael (Blais)
- Cary, Charlie (Cary)
- City of Boston (Boston)
- Clean Energy
- Coalition for Renewable Natural Gas (RNG Coalition)
- Conservation Law Foundation joined by four other organizations and 17 individuals (CLF et al.)<sup>2</sup>
- Cornett, Susan (Cornett)
- Cox, Gregory (Cox)
- Curylo, Steven (Curylo)
- Divert
- Duclos, Michael (Duclos)
- Electrochaea Corporation (Electrochaea)
- Energy Solutions
- Environmental Defense fund (EDF)
- Eversource Energy (Eversource)
- Flat Rock Farm
- Form letter submitted by over 50 Massachusetts residents (50+ residents)
- Form letter submitted by over 250 propane users (250+ propane users)
- Form letter submitted by over 400 small businesses in the hearth, fireplace, and patio industry (400+ small businesses)
- Form letter submitted by over 2500 individual homeowners (2500+ homeowners)
- Global Partners LP (Global)

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<sup>2</sup> Conservation Law Foundation joined by the following four organizations and 17 individuals: Acadia Center, Environmental League of Massachusetts, Green Energy Consumers Alliance, Pipe Line Action Network for the Northeast, Cabell Eames (Belmont resident), Jacqueline Royce (Boston resident), T. Stephen Jones, MD, MPH (Northampton Resident), Carolyn Barthel (Executive Committee Member, 350 Mass), Charles Lidz (Vice Chair, Ashland Sustainability Committee), Rosemary Wessel (Program Director, No Fracked Gas in Mass), Bob Armstrong (Co-Chair, FCCPR Climate Crisis Task Force), Stephan Roundtree, Jr. (Deputy Program Director, Vote Solar), Jess Nahigian (State Political Director, Sierra Club Massachusetts), Claire Karl Miller (Movement Building Director, UU Mass Action), Laura Haight (U.S. Policy Director, Partnership for Policy Integrity), Kathryn Eiseman (Policy Advisor, Partnership for Policy Integrity), Anne Wright (Co-Founder, MA Building Electrification Accelerator), Jane Winn (Executive Director, Berkshire Environmental Action Team), Lucas Duval (Air Quality Monitoring Project Manager, Breathe Easy Berkshires), Rev. Cynthia Davidson (Executive Director, Massachusetts Interfaith Power & Light), Sallye Bleiberg (Advocacy Subcommittee Chair, Brookhaven Residents' Climate Change Committee).

- Good Wood Coalition
- Greater Boston Physicians for Social Responsibility (GBPSR)
- Greater Lawrence Sanitary District (GLSD)
- Hislop, Rob (Hislop)
- Horowitz, Larry (Horowitz)
- Hydrogen and Biomethane Working Group of the Gas Transition Allies (GTA)
- Lapham, Karen (Lapham)
- Lignetics Group (Lignetics)
- Lin's Propane Trucks Corp. (Lin's Propane)
- Lowell General Hospital
- Low-Income Weatherization and Fuel Assistance Program Network the Low-Income Energy Affordability Network (The Low-Income Network)
- Maine Energy Systems
- Maravelias, Michael (Maravelias)
- Mass Coalition for Sustainable Energy (MCSE)
- Massachusetts Municipal Wholesale Electric Company (MMWEC)
- Milton CAT
- M-RETS Inc. (M-RETS)
- Municipal Electric Association of Massachusetts (MEAM)
- National Grid
- New Buildings Institute (NBI)
- North East Biosolids and Residuals Association (NEBRA)
- Northeast Chapter of the Combined Heat and Power Alliance (NE CHPA)
- Northeast Energy Efficiency and Electrification Council (NEEEEC)
- Northeast Energy Efficiency Partnerships (NEEP)
- Northeast Hearth, Patio & Barbecue Association (NEHPBA)
- Oberon Fuels (Oberon)
- Partnership for Policy Integrity (PFPI)
- Pellet Fuels Institute (PFI)
- Pioneer Oil & Propane
- Plissey, Doug (Plissey)
- PowerOptions
- Program Administrators of Mass Save (PAs)
- Propane Plus Corp (Propane Plus)<sup>3</sup>
- Rewiring America
- MA State Senator Patrick O'Connor (Senator O'Connor)
- SRECTrade
- Suburban Propane (Suburban)
- Sumner Heating

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<sup>3</sup> Propane Plus submitted two comment letters during the comment period with similar content. For simplicity, MassDEP has not differentiated between the letters in the summary text. All three comment letters are included in the PDF of comments received.

- Tasse Fuel<sup>4</sup>
- Vanguard Renewables (Vanguard)
- Vergent Power Solutions (Vergent)
- Vicinity Energy Inc. (Vicinity)<sup>5</sup>
- West Boylston Municipal Lighting Plant (WBMLP)
- Westfield Gas and Electric Light Department (WG+E)
- Zellman, Keith (Zellman)

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<sup>4</sup> Tasse Fuel submitted three comment letters during the comment period with similar content. For simplicity, MassDEP has not differentiated between the letters in the summary text. All three comment letters are included in the PDF of comments received.

<sup>5</sup> Vicinity submitted two comment letters during the comment period. For simplicity, MassDEP has not differentiated between the two letters in the summary text. Both comment letters are included in the PDF of comments received.