Clean Heat Standard
2023 Initial Stakeholder Comments

Background:

MassDEP sought initial stakeholder input to inform the development of a proposed CHS regulation and related heating fuel supplier reporting requirements during an initial comment period in April 2023. The program released:

- A discussion document that includes a general description of the CHS concept, additional background information, and specific questions for stakeholders to consider.
- "Straw" regulatory language for heating fuel supplier reporting requirements in support of the CHS.

The documents specifically requested feedback on the following topics:

1. Stakeholder engagement
2. Setting the standard
3. Regulated heating energy suppliers
4. Credit generation
5. Compliance flexibility and revenue
6. Reporting requirements for heating energy suppliers
7. Interactions with other programs
8. Economic analysis

Notes on Comments:

Topic # 1: Stakeholder engagement

Of the roughly 50 comments received, eleven provided specific recommendations and requests for future stakeholder engagement activities, as summarized below. The program has also developed a memo addressing these comments in more depth and suggesting next steps.

- MassDEP should hold a series of meetings on specific technical topics (CLF et al., BEAT, EDF, GTA)
- MassDEP should design different types of engagement opportunities for technical stakeholders and stakeholders who would be impacted by the program but are not themselves or do not employ professional advocates (CLF et al.)
- MassDEP should have meetings focused on municipal input and incorporating existing initiatives like Boston's Building Emissions Reduction and Disclosure Ordinance (BERDO) into the CHS (City of Boston)
- MassDEP should meet with existing district energy systems serving urban communities (MATEP)
- MassDEP should use a third-party consultant for stakeholder engagement that holds monthly meetings, special-issue workshops, and one-on-one conversations and compiles a final report on the process (Eversource Energy)
- MassDEP should solicit input from EJ communities and organizations, housing justice advocates, and low-income residents (MCAN, CLF et al.)
- The decision-making process should be public and recorded presentations, testimony, minutes of meetings with stakeholders and utility representatives should all be made public (GTA)
    - The stakeholder process should be clear and inclusive (Eversource Energy)

- MassDEP should continue to provide straw proposals prior to formal rulemaking processes (Eversource Energy)
- MassDEP should allow adequate time for stakeholders to evaluate materials and prepare for discussions (EDF)
- Stakeholder consultation on further information about the determination of baseline fossil fuel carbon intensity, annual carbon intensity reduction targets, and compliance pathways is needed (Irving Oil)
- MassDEP should pause regulation development until economic impact modeling has been done and there has been more robust consultation (Irving Oil)

Topic # 2: Setting the standard

Stringency: Commenters agreed that the standard should increase in stringency over time (CLF et al., National Grid, DES). Many commenters from the delivered fuels industry argued that the 3% of customers per year suggested in the discussion document was too aggressive and would put delivered fuels companies out of business (Alvin Hollis and Company, CFAA, Sobon). Two commenters noted the need to address weather variability in setting the standard (CLF et al., DES) and another suggested that the standard should cover all combustion appliances such as water heaters, stoves, and dryers in addition to boilers and furnaces(CLF et al.). Some commenters provided specific requests around the calculation of stringency:

- The standard should be based on the 'High Electrification' scenario not the 'Phased Scenario' from the 2025/2030 CECP (CLF et al.)
- A steady 1 MMT per year emissions reduction could be achieved with a 5% standard in 2025 increasing to 7% by 2030 (CLF et al.) and if DEP determines more than 1 MMT emissions reductions per year is feasible by including other clean fuels, the standard should be set more stringently (Ameresco)
- The obligation should be 5% in 2025 and 10% in 2030 (DES)[1]

How the Standard should be expressed: No commenter suggested basing the standard on metrics other than emissions reductions, such as square feet of conditioned space. Several commenters expressed general support for expressing the standard in greenhouse gas emissions reductions (A Better City, Anew, DES, CLF et al.). Two commenters requested the standard be based specifically on the carbon intensity of fuels (Ameresco, Irving Oil).

Carve outs and multipliers: Many commenters were supportive of carve outs (CLF et al., National Grid, PAs, Sen. Creem) or multipliers (PAs) to support low-and-moderate income (LMI) households and equity goals. One commenter was against all carve outs (DES) and another was against a carve out for electrification (Ameresco). Similarly, one commenter opposed any multipliers based on technology or fuel (Albrecht). Commenters also suggested multipliers for early overcompliance (Global), geographically targeted networked geothermal/electrification (CLF et al., Sen. Creem), and ground source heat pumps (Dandelion). One commenter raised an implementation concern around how credit generators would know which households qualified as LMI (Irving Oil). A group of commenters suggested incentives for the following categories be prioritized for equity purposes: Title I schools, community health centers, food pantries, homeless shelters, and warming centers (CLF et al.).

[1] Note this commenter also argued that setting the standard at 25% below 1990 levels in 2025, in line with the RAP paper, would be the most stringent compliance obligation in the first year of any program in the US and have major impacts on consumers (DES)

Cap-and-invest: A few commenters opposed a complementary cap-and-invest program for the building sector (A Better City, Ameresco, DES) while one commenter suggested a cap could serve as a useful backstop to ensure required emissions reductions are achieved (EDF). A group of commenters requested more information about how the CHS would interact with a cap-and-invest program before taking a position (CLF et al.)

Topic # 3: Regulated heating energy suppliers

Electricity sector: Commenters were divided on whether the electricity sector should have a compliance obligation. Those suggesting that the electricity sector be included in the compliance obligation noted that there are greenhouse gas emissions associated with electricity generation and that the sector will expand under the CHS (Ameresco, DES, Noonan, PGANE). Other commenters pointed out that increasing electricity prices is in conflict with the goal of electrification and this sector should not have a compliance obligation (NBI, CLF et al.). Two commenters specifically stated that municipal electric territories should be included in the CHS, although not specifically arguing for including the electric sector in the obligation (MCAN, PAs).

Delivered fuels: Many commenters stated that fossil fuel energy suppliers should be subject to the CHS (Anew, Ameresco, CLF et al.) and no commenter suggested that these sectors should not have a compliance obligation. Several commenters emphasized that the compliance obligation should fall on retailers that deliver fuels to the end user and not on wholesalers (Dead River Company, DES, MEMA). One commenter suggested the obligation should fall on the entity that brings the relevant fuel into Massachusetts, regardless of whether that entity is a retailer, wholesaler, or terminal operator (Global). For natural gas, one commenter thought the obligation should be on the gas distribution utilities (PowerOptions), one thought the obligation should be on the competitive suppliers (National Grid), and some noted that municipal gas utilities should be included (CLF et al.). One commenter requested clarification as to whether building owners that store fuel on site would be subject to the CHS (A Better City).

Topic # 4: Credit generation

Comments on credit generation focused on 1) which fuels or technologies should be allowed to generate credits, 2) the unit credits should be based on, and 3) methodological approaches for credit calculations. All commenters that addressed this topic agreed electrification should be eligible to receive credits.

Eligible fuels and technologies: Commenters generally fell into two categories regarding eligible technologies. One group argued only non-combustion technologies compatible with Massachusetts' long term net-zero goals should be eligible to generate clean heat credits (CLF et al., GTA) and one group argued the CHS should be 'technology neutral' and allow any activity that reduces emissions to generate clean heat credits (Albrecht, Ameresco, Anew, CFAA, Dead River Company, DES, Eversource Energy, Global, Irving Oil, MCSE, MEMA, National Grid, NEFI, Paylessforoil.com, PGANE, Tasse Fuel, USU/UWU, Vicinity). One commenter suggested that the current carbon intensity of the grid should be used as the threshold for identifying eligible and ineligible technologies (PGANE) and another suggested that a predetermined emissions threshold should be used to determine eligibility (NBI).

Commenters also took positions on specific fuels and technologies, as summarized below:

- Weatherization and energy efficiency
    - Support inclusion (A Better City, Ameresco, CLF et al.)

    - Oppose inclusion (DES)
- Liquid biofuels
    - Support inclusion of all liquid biofuels, regardless of feedstock (Albrecht, Brideau Energy, Cape Cod Oil, Dead River Company, DES, Falmouth Energy, FSI Oil and Propane, Global, Irving Oil, Noonan, MEMA, Paylessforoil.com, Scott-Williams, Inc.)
    - Support inclusion of waste-based liquid biofuels (Anew, CFAA)
    - Oppose inclusion of crop-based liquid biofuels (Anew)
    - Oppose inclusion of all liquid biofuels (GTA)
- District energy systems and combined heat and power (CHP)
    - Support inclusion of district energy systems broadly (MATEP, Vicinity)
    - Support inclusion of CHP, including non-district energy applications, specifically (A Better City, Ameresco, Irving Oil)
    - Oppose inclusion of all CHP (DES, PFPI)
- Renewable natural gas (RNG) and hydrogen
    - Oppose inclusion (CLF et al., GTA)
        - Oppose blending into existing infrastructure (Sen. Creem)
    - Support inclusion (Ameresco, RNG Coalition)
        - Support use in existing infrastructure (RNG Coalition)
        - If allowed, should only be used in hard-to-electrify scenarios (Sen. Creem)
- Hybrid heating systems with fossil fuel backups
    - Oppose inclusion (Sen. Creem)
    - Support inclusion of systems with propane backups (PGANE)
        - Identified the need to verify hybrid systems are used for heating and not just air conditioning (Albrecht)
- Fuel switching between fossil sources
    - Oppose inclusion (DES)
    - Support inclusion (Irving Oil)
- Individual commenters took stances on the following technologies:
    - Oppose inclusion of:
        - Wood (PFPI)
        - Electric resistance, even as a backup (PGANE)
        - Heat pumps that are not enabled for demand-response (Albrecht)
        - Residency requirements for credit generation (Dandelion)
        - Retroactive generation of CHS credits (DES)
        - Crediting for mandatory actions under other policies (NBI)
    - Support inclusion of:
        - New efficient propane systems replacing fuel oil (PGANE)
        - Emissions reductions projects across the fossil fuel lifecycle (i.e., refinery projects) (Irving Oil)
        - Clean heat systems provided under energy service contracts or lease agreements (Dandelion)
        - Clean heat systems in new construction (Dandelion)
        - Portable clean heat units (Dandelion)

Commenters also identified a need for a methodology to qualify new technologies as they become commercially available (DES), suggested that credit calculations should consider health impacts as well as emissions reductions (PGANE), and requested that early credit creation be expanded (Irving Oil).

Methods for credit calculations: Many commenters suggested DEP should base credit calculations on pre-established methodologies such as the Mass Save programs (CLF et al.) or the federal GREET model, or similar lifecycle analysis approach (DES, Falmouth Energy, FSI Oil and Propane, Global, MEMA, NBI, NEFI, Noonan, PGANE, RNG Coalition, Tasse Fuel, Albrecht, Ameresco, Anew, CFAA). One commenter recommended DEP coordinate with EPA and other states to harmonize a single model for carbon intensity scoring (Irving Oil).

Many comments on methodologies for calculating clean heat credits focused on whether emissions from electricity generation should be included in calculations and if so, how those emissions should be quantified. Several commenters argued that electricity should be considered zero-emitting for crediting purposes (CLF et al.) while others supported factoring emissions from electricity generation into credit calculations (Albrecht, Dead River Company, DES, FSI Oil and Propane, Global, Irving Oil, MEMA, National Grid, NEFI, PGANE, Scott-Williams, Inc., Tasse Fuel). Some of these commenters offered detailed methodological suggestions such as basing electricity emissions on the winter generation mix (DES), on marginal emissions rates (Albrecht), or on emissions calculated including RECs from within and outside of ISO-NE (Vicinity).

In addition to the more general concepts described above, commenters requested DEP consider the following topics:

- Warming potential and leakage rates for hydrogen and other synthetic fuels (EDF)
- Inclusion of methane leaks in carbon intensity scores for natural gas (DES)
- Time value of carbon favoring emissions reductions achieved earlier (Albrecht)
- Separate calculation of carbon intensity and efficiency, but inclusion of both in credit values (NBI)
- High temporal matching of heat pump load to renewable generation (Albrecht)
- Quarterly minting of credits from ASHPs to ensure credits are only generated from heating use (DES)
- Exclusion of consideration of refrigerant emissions from credit calculations (CLF et al.)
- Modeling to determine baseline fossil fuel carbon intensity (Irving Oil)
- Lifecycle emissions from production and transport of heat pump appliances, which need to be replaced more frequently than boilers and emissions from materials needed for battery storage (Noonan)

Third-party verification and transparency: Several commenters support the use of third-party verification or other oversight mechanisms in the CHS (Ameresco, CLF et al., Irving Oil). One commenter noted the importance of credit market transparency to protect consumers from unnecessarily high credit prices (Global). One commenter emphasized that compliance assurance and verification measures should consider consumer privacy (PAs).

Miscellaneous: Commenters provided several specific requests around credit market mechanics including that DEP should develop guidance for registration and reporting (Irving Oil), that retailers of delivered fuels should own credits generated through delivery of clean heating fuels whereas building owners/operators should own credits for other clean heat technologies (Ameresco, DES), and that credit

ownership should be available to residents, property owners, or business that install or lease clean heating systems (Dandelion).

Topic # 5: Compliance flexibility and revenue
Commenters were generally supportive of compliance flexibility as described in the stakeholder discussion document and including an alternative compliance payment (ACP) in the program (Anew, Ameresco, CLF et al., CSG, DES, Irving Oil, MATEP, PAs) although some emphasized that ACP should be a last resort option (Ameresco), accompanied by a price floor (Anew, Irving Oil), and based on the social cost of carbon (DES). One commenter noted flexibility was needed to account for technologies that do not currently exist (MATEP) and another requested flexibility to accommodate clean heat deployed prior the implementation of the CHS (A Better City). Commenters also supported the following options for compliance flexibility: compliance over multiple years (CSG, MATEP), credit banking (CSG, DES, Global) with no limits on the amount of credits than can be banked or the number of years they can be rolled over (DES), transfer of compliance obligation between entities via contractual agreements (Irving Oil), and inclusion of an emissions reduction fund (Irving Oil). One commenter opposed including a default delivery agent in the CHS and suggested DEP should mandate the use of aggregation for all stakeholders (DES) while another requested any pre-minting of certificates should be based on lifecycle analysis using projected marginal emissions rates (Albrecht).

Many commenters agreed that most or all revenue generated should be used to support LMI households (National Grid, PAs, CLF et al.). This support could include direct bill assistance or lowering rates by offsetting the energy efficiency surcharge (PAs) or mitigating impacts on affordable housing (National Grid). One commenter suggested ACP funds should be used to fund all renewable thermal resources, not just electrification (Albrecht) and another suggested a portion of ACP funds could be directed to the Mass Save Program Administrators to offset the costs of energy efficiency and electrification programs (National Grid). One commenter emphasized that ACP funds should only be used to support the purposes of the CHS and not diverted for other purposes (National Grid).

Three commenters noted that additional public funding outside of the CHS, such as the state general budget or ARPA funds, is needed to support the transition to clean heat (CLF et al., PAs, W.H. Riley & Sons)

Topic # 6: Reporting requirements for heating energy suppliers and heating fuel storage facilities
Commenters raised concerns that the reporting requirements would create an additional administrative burden for many small businesses (FSi Oil and Propane, MEMA, MATEP, Falmouth Energy, Dead River Company, Tasse Fuel, Diversified Energy Specialists, Paylessforoil.com). A few commenters supported quarterly reporting (CLF et al.) whereas others suggested reporting should be biannual in the fall and spring to avoid reporting during the peak heating season (DES, MEMA). Commenters also identified several challenges around implementation that MassDEP will need to consider including: lack of oversight, compliance, or enforcement mechanisms (Irving Oil, FSI Oil and Propane, Tasse Fuel, Noonan), complexity in handling out-of-state companies that deliver fuel to Massachusetts and in-state companies that deliver fuel outside of Massachusetts (FSI Oil and Propane, Tasse Fuel), the 'aggressive' implementation schedule (DES), and reconciliation of information reported by heating fuel suppliers and storage facilities (Noonan).

A few commenters identified specific corrections or clarifications needed, such as, changing the units in the natural gas emissions factor from square cubic feet to million square cubic feet (Eversource Gas), clarification on the definition of heating fuel supplier with regards to building owners (A Better City), and

additional guidance needed to support entities required to report (Irving Oil). One commenter suggested all reporting should be done via third-party aggregation (DES).

One commenter requested emissions from fuels other than heating oil, propane, and natural gas be calculated using emissions factors calculated on an individual basis (National Grid) and one commenter emphasized there should be no exceptions in emissions reporting for synthetic fuels (EDF).

Topic # 7: Interactions with other programs
Some commenters were generally supportive of allowing stacked incentives across multiple programs (Ameresco, Irving Oil) while others opposed stacking incentives (CLF et al.). One commenter suggested that stacking incentives should be allowed to benefit LMI communities specifically (Anew). One commenter emphasized that stacking incentives would need to be implemented in a way that did not double-count of emissions reductions (EDF).

Alternative Portfolio Standard: Commenters had mixed feedback on how the CHS should interact with the existing APS program. One requested that the CHS should replace the APS (DES) whereas another suggested the programs should merge (GTA) and two emphasized that the CHS should not negatively impact the APS (MATEP, Next Grid). Commenters were also divided on whether projects should be allowed to qualify for both programs, with one arguing that projects should generate credits in both (DES) and the other recommending either a structure akin to the CES and RPS or simply only allowing projects to qualify for one program (Next Grid).

Some commenters provided feedback on the existing eligibility requirements in the APS program:

- DOER's APS guideline for large, water-sourced heat pumps should be revised to accommodate high temperature industrial heat pumps and recognize waste heat (Vicinity)
- The APS should be expanded to include all biofuel feedstocks rather than just waste-based biofuels (FSI Oil and Propane, MEMA, Tasse Fuel)
- Biomass eligibility should be eliminated from APS and not carried over to CHS (PFPI)
- The CHS should not adopt the biofuel feedstock requirements from the APS (DES)

Other programs: Commenters also provided feedback on several other programs as summarized below:

- The CHS should integrate seamlessly with existing Mass Save programs (PAs)
- Mandatory actions under BERDO or other local programs should not receive CHS credits (NBI)
- Disincentive for biofuels is in contradiction to federal Higher Blends Infrastructure Incentive Program (HBIIP) program extended through the Inflation Reduction Act (IRA) (Noonan)
- The Clean Peak Energy Standard should be updated to allow thermal energy storage and dispatch (Vicinity)

Topic # 8: Economic analysis
Commenters agreed that the CHS should be designed to avoid increasing the energy burden of LMI households or disproportionately harming low-income and EJ communities (Eversource Energy, Global, MCAN, PowerOptions, PAs, A Better City, CLF et al.). Many commenters requested DEP evaluate the potential economic impacts on consumers and small businesses (FSI Oil and Propane, Irving Oil, Lombardi Energy, Noonan, Tasse Fuel, Alvin Hollis and Company, Auth Fuels, Brideau Energy, Cape Cod Oil, Central Energy). Commenters also requested DEP evaluate the cost associated with the expansion of electric generation, transmission, and distribution capacity needed to support heat pumps (Albrecht) and that DEP undertake a cost benefit analysis looking at impacts on energy security and supply,

industry, businesses, consumers (in cents per gallon), and unintended consequences (Irving Oil). Finally, many commenters raised concerns that heat pump technologies are expensive and not able to meet heating needs in cold temperatures (Albrecht, DES, Fuel Management Services, Inc., Irving Oil, MEMA, NEFI, Paylessforoil.com, Scott-Williams, Inc., W.H. Riley & Sons).

In addition, commenters raised the following specific concerns related to economic impacts:

- Increased load from heat pumps will increase the cost of wholesale power (Albrecht, Noonan)
- CHS is an escalating tax on liquid fuels and costs will be passed on to consumers (Dead River Company, DES, Falmouth Energy, MEMA, Noonan)
- Commodity surcharge would be added to gas bills to send appropriate price signal (National Grid)
- With the current rate design, gas customers who are least able to electrify their homes will have to pay a higher share of the fixed cost of the gas system (CLF et al.)
- Allowing alternative fuel technologies in the CHS will make decarbonization more affordable for LMI households, including those in renter-occupied buildings (National Grid)
- Impact of CHS could range from 12 to 20 cents per gallon of heating oil at credit prices of $300/ton-$500/ton (Irving Oil)
- Increased costs associated with the CHS will negatively impact MA energy market participants' competitiveness in the region (Irving Oil)

Other

Legal concerns: Commenters from the fuel oil industry raised a variety of legal concerns including that the CHS is not within DEP's authority (FSI Oil and Propane, Tasse Fuel, Frank Lamparelli Oil Co.), the CHS would conflict with MA Consumer Protection and Business law (DES, FSI Oil and Propane, Lombardi Energy, Tasse Fuel), the CHS would be unconstitutional and violate the Dormant and Commerce Clauses (FSI Oil and Propane, NEFI), the CHS would be antitrust (Paylessforoil.com), and that the industry is seeking legal council because the CHS would eliminate small businesses in favor of quasi-public monopolies that are sometimes foreign owned (MEMA, NEFI, Noonan). Finally, one commenter said DEP should consider the "overall applicability of the Clean Heat Standard to certain suppliers in light of recent legal decisions" (Eversource Energy).

Health impacts: Some commenters pointed out the importance of considering health impacts in the CHS (PGANE, GTA, CLF et al.). One commenter said public health should be a stated goal of the CHS (GTA). Another commenter noted that switching from fuel oil to biodiesel can have positive health benefits and suggested DEP use EPA's GREET/SMOKE/COBRA models to evaluate health impacts to EJ and LMI communities from electrification (Albrecht).

Workforce: A few commenters noted limited workforce availability to support rapid deployment of heat pumps (Eversource Energy, Paylessforoil.com). Two commenters recommended that considerations around equity should include how to have a just and equitable transition for gas industry workers (National Grid, USU/UWU). Another commenter emphasized that the pipeline industry provides high paying jobs (MCSE).

Energy security: Several commenters expressed concern that the electric grid is not equipped to handle electrification of heating sector while providing reliable service (Albrecht, Irving Oil, NEFI, Noonan, Scott-Williams, Inc.) or more generic concerns about electricity supply and grid reliability (Eversource Energy).

One commenter argued that increased demand on the grid exposes economy and grid to attacks from foreign adversaries and terrorists (NEFI) while another noted that energy providers face supply challenges from conflict in Ukraine and new climate/energy policies (Irving Oil).

Timeline: Commenters in the fuel oil industry expressed concern with the implementation timeline for the CHS because fuel oil suppliers sign contracts up to 18-months in advance, companies need to make capital investments to support cleaner fuels, and DEP needs enough time set up structures of oversight and enforcement (DES, Dead River Company, Irving Oil).

Other concerns and requests:

- The CHS punishes organic growth of family-owned fuel oil companies (DES, FSI Oil and Propane, Tasse Fuel)
- The heating oil industry has already undertaken actions to reduce carbon emissions and is no track to provide net-zero liquid biofuel by 2050 (Irving Oil, Falmouth Energy, Fuel Management Services, Inc., Scott-Williams, Inc., W.H. Riley & Sons)
- The CHS development process should include consideration of changes in gas rate design needed to support transition to RNG (RNG Coalition)
- DEP should be working with DOER and DPU to force accelerated progress on equitable gas restructuring (CLF et al.)
- MA should implement organic waste recycling mandates to support growth in RNG producing facilities and jobs (RNG Coalition)
- The CHS should not include a ban on new gas infrastructure (Ameresco)
- DEP should continue pursing refrigerant emissions reductions strategies including incentivizing factory-sealed heat pumps, lower GWP refrigerants, contractor retraining, and higher payment for refrigerant recovery (CLF et al.)

<u>List of Commentators</u>

- A Better City
- Alvin Hollis & Company
- Ameresco
- Anew
- Auth Fuels
- Boston Climate Action Network
- Brideau Energy
- Cape Cod Oil and Propane
- Carbon Solutions Group (CSG)
- Central Oil Company
- City of Boston
- Clean Fuels Alliance America (CFAA)
- Conservation Law Foundation joined by 37 organizations and 14 individuals (CLF et al.)[2]

[2] Conservation Law Foundation (CLF) joined by the following 37 organizations and 14 individuals: Green Energy Consumers, Acadia Center, Pipe Line Awareness Network for the Northeast (PLAN), HEET, Alternatives for Community & Environment (ACE), Berkshire Environmental Action Team (BEAT), Boston Housing Authority, Building Electrification Accelerator, Ceres, Clean Water Action, Climate Action Now, Western Mass, Climate Reality

- Coalition for Renewable Natural Gas (RNG Coalition)
- Dandelion Energy (Danelion)
- Dead River Company
- Diversified Energy Specialists (DES)
- Environmental Defense Fund (EDF)
- Eversource Energy
- Eversource Gas
- Falmouth Energy
- Frank Lamparelli Oil Co., Inc.
- FSI Oil and Propane
- Fuel Management Services, Inc.
- Global Partners LP (Global)
- Green Harbor Energy
- Hydrogen/Biogas Working Group of Gas Transition Allies (GTA)
- Irving Oil
- Lombardi Energy
- MA Energy Marketers Association (MEMA)
- MA State Senator Cindy Creem (Sen. Creem)
- Mass Coalition for Sustainable Energy (MCSE)
- Mass Save Program Administrators (PAs)
- Massachusetts Climate Action Network (MCAN)
- Medical Area Total Energy Plant (MATEP)
- National Energy & Fuels Institute (NEFI)
- National Grid
- New Buildings Institute (NBI)
- Next Grid
- No Fracked Gas in Mass, Berkshire Environmental Action Team (BEAT)
- Noonan Energy (Noonan)
- Partnership for Policy Integrity (PFPI)
- Paylessforoil.com Inc.
- PowerOptions
- Propane Gas Association of New England (PGANE)
- R J McDonald Inc.

Massachusetts Southcoast, Environmental League of Massachusetts, FCCPR Climate Crisis Task Force, Greene Energy Consultants LLC, Greening Greenfield, League of Women Voters of Massachusetts, Lexington Climate Action Network (LexCAN), LISC Boston, MA Association of Community Development Corporations, MAPC, Mass Audubon, MCAN, Metrowest Climate Solutions.org, Mothers Out Front Massachusetts, No Fracked Gas in Mass, Northeast Clean Energy Council, Northeast Energy Efficiency Partnerships (NEEP), Partnership for Policy Integrity, Pure Strategies, Sierra Club Massachusetts Chapter, Sustainable Wellesley, The Nature Conservancy, UU Mass Action, Vote Solar, ZeroCarbonMA, State Representative Lindsay Sabadosa, State Representative Rodney Elliott, Jacqueline Royce (member, Boston Green Action), Juliette Haas, Lisa Smith (member, Cape Ann Climate Coalition), Louise Amyot (member, Greening Greenfield), Martyn Roetter (member, Gas Transition Allies), Mary Klug (member, 350MASS), Michael McCord (member, Boston Green Action), Patricia Nolan (member, Cambridge City Council), Paul Popinchalk (member, 350 Central Mass), Robert Triest (member, Department of Economics, Northeastern University), Steven E. Miller (member, 350 Mass), Susan Hoague (member, Cape Ann Climate Coalition)

- Raymond J. Albrecht LLC (Albrecht)
- Reliable Oil
- Scott-Williams, Inc.
- Mark Sobon (Sobon)
- Tasse Fuel / Crowley Fuel (Tasse Fuel)
- United Steelworkers Union, Locals 12003 and 12012, and the Utility Workers of Union of America, Local 369 (USU/UWU)
- Vicinity Energy (Vicinity)
- W.H. Riley & Son Inc.