



**TECHNET**  
THE VOICE OF THE  
INNOVATION ECONOMY

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February 5, 2019

Commissioner Judith Judson  
Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

Dear Commissioner Judson and EEAC members:

TechNet is the national, bipartisan network of over 80 technology companies that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50 state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents more than three million employees in the fields of information technology, e-commerce, clean energy, telecommunications, gig economy, sharing economy, venture capital, and finance. TechNet is committed to advancing the public policies and private sector initiatives that make the U.S. the most innovative country in the world.

TechNet greatly appreciates the hard work of the Department of Energy Resources (DOER) and the time and efforts to thoughtfully develop a clean peak standard (CPS). TechNet respectfully submits the following comments in response to the DOER's CPS Draft Stakeholder questions. In particular our comments are focused on answering questions 3 and 4.

First, TechNet is strongly opposed to the idea that DOER might exclude fossil fueled demand response from CPS eligibility, as others have recommended. While it is certainly reasonable that a backup diesel generator with a CO2 emissions rate of over 2000 lbs/MWh and significant emissions of SO2, NOx, and particulate matter should not generate a clean peak credit, there are many other technologies that can use fossil fuels to provide significant emissions reductions while acting as a demand response resource. Climate change and air quality impacts are driven by the amount of emissions released into the atmosphere, not ideology. As such, DOER should not apply a blanket ban of fossil fuels in CPS eligible demand response. This approach would have the effect of limiting the amount of emissions reductions the program can achieve and stifling innovations that could prove essential to helping the Commonwealth achieve its ambitious efforts to combat climate change. Instead, DOER should apply a requirement that CPS eligible resources reduce emissions of CO2 and other harmful pollutants based on the most recent ISO New England Electric Generator Air Emissions Report.

Second, DOER should take a holistic approach in developing the CPS regulations and consider not just the benefits to the electricity supply but also gas supply. One of the most significant environmental impacts from peak periods in New England are winter peaks where high demand for heating drives natural gas scarcity and forces ISO New England to dispatch electricity generation from dirty fuel oil while also driving up prices. DOER should consider that some fossil fuel demand resources help this problem by using gas more efficiently. DOER should not unintentionally exclude these benefits by only considering changes to electricity demand in the scope of eligible technologies or program benefits.

Last, with regard to whether electric vehicles (EVs) and EV charging equipment and network services are qualified, TechNet recommends that the Department take a technology-neutral approach that supports multiple business models and ensures accurate and verifiable data.

Thank you in advance for your consideration on these matters.

Sincerely,

/s/

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