



June 30, 2016

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

Re: Comments on the Renewable Heating and Cooling in the Alternative Portfolio Standard

Dear Ms. Meserve,

The International Association of Plumbing and Mechanical Officials Research (IAPMO) is a ANSI-accredited certification body, standards developer and code developer which celebrated its 90th year in business last month. IAPMO commends the DOER for its work to develop the regulations associated with the inclusion of renewable heating and cooling in the APS.

However, in 225 CMR 16.05 (1)(a)(6)(a)(iv) Solar Thermal of the draft regulations, the language specifically calls for certification of solar thermal collectors by the Solar Rating and Certification Corporation (SRCC), a private entity in direct competition with IAPMO for the same customers in a relatively small industry. Naming a single private entity in the regulation brings up issues of open markets for services and fair competition. There are only two entities that certify solar thermal equipment in the US – IAPMO Research and Testing, and SRCC; some companies choose to work with one rather than the other, and that option should be available to them. Naming a single entity in the regulation has the net effect of directing all certification business to that company, thereby eliminating the free market efficiencies achieved through competition.

In fact, the Massachusetts Clean Energy Center revised their policy of requiring SRCC certification, to one where they name both SRCC and IAPMO as recognized certification bodies. See MassCEC [Residential and Small Scale Solar Hot Water Manual](#), page 10, Section 3.1. Also note that other states, including [Florida](#)¹, [California](#)², [Arizona](#)³ and [Nevada](#)⁴ recognize IAPMO certification.

For these reasons, we respectfully request that the regulations be amended to specifically recognize IAPMO certification as eligible in Section 6 (a) (iv), and that the following be added to Section 16.02 Definitions:

International Association of Plumbing and Mechanical Officials. IAPMO is a non-profit, accredited standards developer and certification body which rates and certifies solar heating collectors and systems.

¹ Florida Solar Energy Center, Testing and Certification webpage

² California Solar Initiative-Thermal Program Handbook, Section 2.4, pg.13

³ Salt River Project Solar Water Heating Program, Eligibility webpage

⁴ Nevada Energy Solar Thermal Water and Space Heating Program Handbook pg. 7

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Finally, we draw your attention to [IAPMO/ANSI Standard S1001.4](#) Energy Production Rating of Solar Heating Collectors. This standard, approved by the American National Standards Institute, is a consensus standard which is available free of charge. It sets forth a procedure for calculating the thermal output of a solar collector based on a laboratory test report performed according to SRCC Standard 100. A companion product, IAPMO's [Solar Ratings Calculator](#), which is also free of charge, provides an automated means to perform the calculation methodology set forth in the standard, and can generate the thermal performance certification requirement set forth in 225 CMR 16.05 (1)(a)(6)(a)(iv). IAPMO requests that this calculator be recognized as an eligible collector performance rating methodology.

Thank you for the opportunity to provide these comments. Please let me know if additional information or clarification is necessary.

Sincerely,

A handwritten signature in black ink, appearing to read 'Les Nelson', with a stylized, flowing script.

Les Nelson
Vice President, IAPMO Solar Heating and Cooling Programs

cc: Monte Bogatz
Gordon MacEwan