



Ms. Samantha Meserve
 Deputy Director, Renewable and Alternative Energy Division
 Massachusetts Department of Energy Resource
 100 Cambridge St #1020
 Boston, MA 02114

December 4, 2020

RE: The Massachusetts Department of Energy Resource (DOER) 2020 Alternative Energy Portfolio Standard (APS) Minimum Standard Review

The Combined Heat and Power Alliance (CHP Alliance) respectfully submits the following on behalf of 2G Energy, AB Energy USA, Capstone Turbine Corporation, Cogen Power Technologies, Curtis Power Solutions, Enginuity Power Systems, Entropy Research LLC, Heat Is Power Association, Henry F. Teichmann Inc., Integrated CHP Systems Corporation, Kanin Energy, Midwest Cogeneration Association, Solar Turbines Inc., Sterling Energy Group LLC, and Turbine Inlet Cooling Association in response to the 2020 APS Minimum Standard Review per 225 CMR 16.07(3). The Massachusetts DOER has solicited comments to several stakeholder questions. To assist in the APS review, DOER hired an independent consultant, Daymark Energy, LLC, to undertake an assessment of the APS program.

The CHP Alliance is a diverse coalition and the leading national voice for the deployment of Combined Heat and Power (CHP). We are a coalition of business, labor, contractor, non-profit organizations, and educational institutions with the common purpose to educate all about CHP, and how CHP can make manufacturers and other businesses more competitive, reduce energy costs, enhance grid and customer reliability, and reduce emissions.

The CHP Alliance fully endorses the comments submitted by the Northeast Clean Heat and Power Initiative (NECHPI)—attached to this document—which states there are several assertions in the Daymark Energy APS Review that are highly controversial and urges the DOER to revisit the empirical basis for the following claims:

- that there are no CO₂ savings from CHP;
- the capital costs of CHP systems assumed by the Daymark report;
- the Operations and Maintenance costs of CHP systems assumed in the report;
- the expected years to payback assumed in the report;
- the level of incentive that the CHP systems would receive from other (Non-APS) programs, that assumed in the report, and to provide a more comprehensive picture; and
- list the full suite of environmental, societal, ratepayer, jobs and economic development benefits provided by CHP vis-à-vis other qualifying APS technologies.

The CHP Alliance fundamentally disagrees with the Daymark Energy study claims that CHP offers no CO₂ reductions, and urges the DOER to specifically refer to items in the appendix of NECHPI comments supporting the benefits of CHP:

- A list of CHP site testimonials that have brought proven benefits to the State of Massachusetts and value the support the State has given them in their installation and operation of CHP; and,
- A slide presentation commenting on the analysis conducted by Daymark that concluded natural gas CHP provides no CO₂ reductions.

Lastly, the CHP Alliance urges the DOER to refer to our [Smart Solutions to Reduce Greenhouse Gas Emissions Factsheet](#), which outlines the significant opportunity to reduce emissions using CHP technologies.

Respectfully,

2G Energy Inc.

AB Energy USA

Capstone Turbine Corporation

Cogen Power Technologies

Combined Heat and Power Alliance

Curtis Power Solutions

Enginuity Power Systems

Entropy Research LLC

Heat Is Power Association

Henry F. Teichmann, Inc.

Integrated CHP Systems Corporation

Kanin Energy

Midwest Cogeneration Association

Solar Turbines, Inc.

Sterling Energy Group LLC

Turbine Inlet Cooling Association