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December 4, 2020

Samantha Meserve
Department of Energy Resources (DOER)
100 Cambridge Street, Suite 1020
Boston, MA 02114

Submitted Via Email: DOER.APS@mass.gov

Re: **2020 APS Minimum Standard Review**

Dear Ms. Meserve:

Thank you for the opportunity to provide input on the Alternative Portfolio Standard (APS) review process, based on the technical review conducted by Daymark Energy, LLC and the stakeholder questions posed by DOER.

Mass Audubon strongly support the Commonwealth's initiatives to address climate change. This is a top priority issue, impacting both people and nature in profound ways, from rising sea levels and more intense storms, to droughts and heat impacts -- affecting human health and safety, fisheries and wildlife, forests and wetlands, agriculture, infrastructure, and the economy. We strongly support the goals of the Global Warming Solutions Act (GWSA), and efforts to further strengthen Massachusetts' climate actions and meet the Decarbonization Roadmap to 2050 goal of Net Zero Emissions. Mass Audubon is a member of the GWSA Implementation Advisory Committee (IAC) and endorsed the Guiding Principles and Policy Priorities for the Clean Energy and Climate Plan for 2030.

The APS program provides financial incentives for energy efficiency and alternative technologies to reduce emissions. The technical review of the program found that Combined Heat and Power (CHP) units do not need these incentives, and Mass Audubon supports removal of this category from the program. More generally, the program should be modified to increase incentives for zero-emission renewable heating technologies like air and ground source heat pumps and solar thermal. These are the most cost-effective uses of the funding, and most consistent with the programmatic goals of reducing GHG emissions. The GWSA IAC policy recommendations include removal of biomass and municipal solid waste combustion from eligibility under the APC and other programs, in order to meet the Decarbonization Roadmap to 2050 goal. It should also be noted that the state is relying on the capacity of land, including forestlands, to absorb and store carbon as well as provide climate resiliency, as key components of both its mitigation and adaptation strategies. We encourage DOER to ensure that the APS review fully aligns this program with the state's overarching climate goals and plans. We also recommend that this review process incorporate program refinements designed to increase access to the program for low income and Environmental Justice communities and that outreach about the program be targeted to ensure it reaches these audiences.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "E. Heidi Ricci".

E. Heidi Ricci
Director of Policy