



Massachusetts Energy Marketers Association

July 19, 2018

Comments: The Massachusetts Energy Efficiency Advisory Council Draft Resolution for the 2019-2021 Three-Year Energy Efficiency Plan

The Massachusetts Energy Marketers Association (MEMA), established in 1955, is the state trade association representing retail and wholesale suppliers of heating oil, diesel fuel, renewable liquid biofuel and propane; producers and distributors of renewable liquid biofuel; national and local manufacturers of residential and commercial heating equipment; and licensed oil burner technicians. The MEMA is also the official state association for all programs funded through the National Oilheat Research Alliance (NORA) in Massachusetts.

The MEMA strongly opposes the “**Priority**” outlined in section **C. Fuel Switching** on page 5 of the draft resolution for the *2019-2021 Three Year Energy Efficiency Plan* that seeks to “promote & incentivize fuel switching strategies in all sectors” for the following reasons:

- Converting oil heated or propane heated homes to cold-climate heat pump technology is not economically viable, and cold-climate heat pump conversions present significant technical problems for homeowners.
- Greenhouse gas emissions from oil-fired heating systems utilizing ultra-low sulfur heating oil (15 parts per million) blended with renewable biofuel/biodiesel at varying levels are equivalent to, or lower than emissions from typical natural gas heating systems.
- Electric utility rate design that allows the Massachusetts Program Administrators (PAs) to market and subsidize residential conversions from heating oil and propane to electric heat pumps will be an added financial burden to electric rate payers; and allows the PAs to establish a predatory position within the Commonwealth’s energy marketplace.
- The EEAC has overstepped its authority with the draft 2019-2021 plan. The EEAC should not be crafting and endorsing policy that chooses winners and losers. The EEAC’s role is clearly defined under the Green Communities Act, and that role does not include authoring and sanctioning plans that favor the PAs over other fuel sources; are not technically sound; unfairly influence consumer home energy choices; and will have a long term detrimental impact on the Commonwealth’s heating oil and propane industries and their employees.

As a non-voting member of the EEAC the MEMA requests that the EEAC strike section **C. Fuel Switching** in the 2019-2021 plan.

In closing, the heating oil industry plays a key role in Massachusetts energy landscape by providing an array of products and services to a significant number of homes and businesses statewide. The industry has made noteworthy strides in the areas of energy efficiency and cleaner fuels by:

- Replacing older, less efficient oil-fired heating systems with newer higher efficiency oil-fired systems.
- Establishing an industry-funded equipment rebate program in Massachusetts that has provided rebates for new, high efficiency oil-fired boilers and furnaces and storage tanks to over 2000 homes since 2017.
- Reducing heating oil use statewide by an average of 200 gallons annually per household.
- Introducing ultra-low sulfur heating oil (15 ppm) statewide on July 1, 2018.
- Expanding the use of biofuel/biodiesel blends in heating oil at levels as high as B20 (20%) in every gallon of fuel.

Rather than seeking pathways to erode the heating oil industry, the EEAC should recognize the contributions the industry is making to the Commonwealth's environmental and energy efficiency goals.

Our association intends to share these comments with the office of the Massachusetts Attorney General.

Respectfully submitted,

Michael Ferrante

Michael Ferrante, President, Massachusetts Energy Marketers Association

Attachments:

NORA-Entropy Research LLC – June 2018: Analysis of Fuel Cycle Energy Use and Greenhouse Gas Emissions from Residential Heating Boilers

NORA Technical Note – July 2015: Modeled Energy and Economic Performance Assessment of a Portland, ME. Home with an Existing Oil-Fired Non-Condensing Boiler and a Two-Head Mini-Split 38,000 BTU Heat Pump Operating in Three Modes