



1385 Hancock Street
Quincy MA. 02169

Date: May 21, 2015

Commonwealth of Massachusetts
Energy Efficiency Advisory Council
100 Cambridge Street
Boston, MA 02114

Dear Council Members:

I am writing today to support the adjustment of eligibility criteria to allow all-electric fuel cells to compete within the Massachusetts CHP Program. All-electric fuel cells produce electricity without combustion, resulting in fewer emissions and reduced environmental impacts. All-electric fuel cells do not require matching thermal and electric loads, and can be targeted into locations that most effectively enhance the efficiency of the electric system.

The majority of electricity customers in the Commonwealth do not have matching thermal and electric loads. These same customers pay into the MA CHP program, but cannot access the program in its current form. MA electric customers should instead have the ability to choose the form of distributed generation solution that matches their energy use profile and increases the efficiency of the electricity they consume.

The MA CHP program should be enhanced to include consideration of increased system efficiency, economic development, customer resiliency, avoided criteria pollutants, avoided water usage, the extent to which a project displaces less efficient centralized generation, and the degree to which a greater percentage of customer funding leverages the CHP program funding.

Stop & Shop (A division of Ahold USA) has invested in clean and efficient all-electric fuel cell projects in New York – but not in Massachusetts. Adjustments to the MA CHP program eligibility criteria to allow customers who are unable to choose CHP to instead opt for an all-electric fuel cell project will result in a cleaner, more efficient, and more resilient energy supply in Massachusetts.

Thank you for this opportunity to provide comments on this important issue.

A handwritten signature in black ink, appearing to read 'Steven D. DaSilva', with a long horizontal line extending to the right.

Steven D. DaSilva
Senior Director of Maintenance & Engineering

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