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Public Comment - Three Year (2022-2024) Planning Recommendations

TEC Comments on Energy Efficiency 3-year plan.

The Energy Consortium (TEC) commends the EEAC for reviewing its three-year Energy Efficiency Programs periodically to determine if they are successful in lowering the electricity and natural gas usage in Massachusetts. TEC members see the important role of Combined Heat and Power (CHP) in helping Massachusetts meet its energy efficiency goals.

We believe it is important to point out the value of CHP to the goals of the EE Program. As an organization whose members utilize CHP to supplement its use of electricity, it is important that the EEAC consider the value of CHP in the role it plays in facilitating the transition of energy usage to an efficient, reliable, lower carbon producing resource. CHP is important in climate control because it uses fuel more efficiently. It is possible for it to use the same fuel to produce heat and electricity at the same time. EE incentives have played an important role in TEC member decision making about the viability of CHP for their businesses and institutions.

CHP is important for our facilities because it provides us with reliability and resilience. All TEC facilities require reliability and power quality. Many of them are involved in health care and life saving research. Others have businesses that employ many Massachusetts residents and need CHP to make sure their production runs can operate reliably, safely and continually without interruptions.

CHP provides grid stability and can lower growth pressure on transmission and distribution infrastructure, especially with the current push to electrification. CHP can also be instrumental on facilitating the integration of renewables to the grid mix. Reducing the economic feasibility of CHPs would slow that process. These institutions and businesses want to lower their carbon footprint. However, many of TEC members are non-profits so ineligible for receipt of the Investment Tax Credit (ITC). It is also important to note that when planning for an installation that involves as much cost as a CHP unit uncertainty of the EE incentive may impair the project so that financing becomes a problem.

Resiliency is especially important to Massachusetts in this time of adverse weather conditions across the United States as a result of climate change. CHP plays a key role in the distribution network. Not only does CHP support the institution that installs a CHP unit, but it helps to flatten the electric load on the electric grid by reducing the amount of electricity needed at surrounding sites and reduces transmission and distribution needs. CHP is considered an important part of the distributed energy plan. Until there are adequate substitutes for natural gas it is important that CHP be integrated into the energy supply and that the CHP operators and owners be included in discussions about how and what to use as fuel that is appropriate in the future.

As stated throughout this letter we believe CHP is and will continue to be important in the future. We recognize that the EEAC is interested in lowering Green House Gases, as is our membership, but we think there are many paths to do this. We believe the Proposal to continue to study CHP and its role in the EEAC should continue with input from institutions and businesses that have installed CHP.

Respectively Submitted,



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