



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

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Commissioner Judith Judson
Energy Efficiency Advisory Council, Chair
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Commissioner Judson and EEAC members:

TechNet is the national, bipartisan network of over 85 technology companies that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50 state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents more than three million employees in the fields of information technology, e-commerce, clean energy, telecommunications, gig economy, sharing economy, venture capital, and finance. TechNet is committed to advancing the public policies and private sector initiatives that make the U.S. the most innovative country in the world.

TechNet greatly appreciates the hard work of the EEAC and the time and effort that has been committed to the draft three-year plan. However, TechNet respectfully encourages the EEAC and Program Administrators to include all electric fuel cell projects as a key initiative in its revised plan in order to build a cleaner, more resilient energy system in the Commonwealth.

Several of our member companies are actively looking for ways to minimize their energy costs and their environmental impact. Increasing the efficiency of their facilities will not only help them reliably but it will also help the Commonwealth by reducing summer and winter peak events where electricity generation reverts to dirty fuel sources.

One emerging technology that our members have identified to help accomplish this goal is all-electric fuel cells. This is especially important because our members often do not have a well-matched thermal load, so they have historically been unable to pursue CHP projects for onsite generation. Additionally, TechNet strongly advocates for technology neutral approaches to policy, when feasible. CHP projects have long been supported by our EE programs and all electric fuel cells deserve similar treatment.

Lastly, TechNet asks that this change be stated specifically in the report in order to give customers and financiers that have been exposed to recent instability in the APS market an

assurance that the EE program will in fact be open to efficient distributed generation that is cost effective but may not meet the definition of CHP.

Thank you in advance for your consideration on these matters.

Sincerely,

/s/

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