

May 22, 2015

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

Dear Council Members:

I am writing to express the support of Wal-Mart Stores East, L.P. and Sam's East, Inc. (collectively, "Walmart") to the adjustment of eligibility criteria to allow all-electric fuel cells to be included within the Massachusetts CHP ("MA 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 towards 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, while increasing 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.

Walmart has invested in clean and efficient all-electric fuel cell projects in California and Connecticut, but has yet to do so in Massachusetts. Adjustments to the MA CHP program eligibility criteria that would allow customers who are unable to choose CHP, the opportunity to 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.

  
David Ozment

Senior Director, Walmart Energy