



Andrew Gottlieb
Executive Director

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Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

RE: Support for Cape and Vineyard Electrification Offering

Dear Secretary Marini:

The Association to Preserve Cape Cod (APCC) writes in strong support of the Cape Light Compact's petition for approval of a compliance filing in D.P.U. 20-40 regarding implementation of the Cape and Vineyard Electrification Offering (CVEO).

Founded in 1968, APCC is the leading regional nonprofit environmental advocacy and education organization on Cape Cod. Supported by thousands of members from every Cape Cod town, APCC's mission is to promote policies and programs that foster the preservation of the Cape's natural resources. APCC focuses its efforts on the protection of groundwater, surface water, and wetland resources, preservation of open space, the promotion of responsible, planned growth and the achievement of an environmental ethic. APCC is also fully engaged in local, regional, state and national efforts to mitigate climate change through actions that reduce dependence on fossil fuels and cut carbon emissions.

APCC supports the Compact's proposed CVEO, an innovative initiative that will deliver cost-effective energy savings and greenhouse gas emissions reductions. The CVEO will replace a customer's fossil fuel-based or electric resistance heating system with a cold climate heat pump that uses electricity for space heating and cooling. The heat pump's electricity usage will be offset by the installation of a solar PV system that produces renewable electricity on site, avoiding additional new loads to the electric grid. A battery storage system will be installed as part of the CVEO, providing a source of backup power for the CVEO customer in the event of an electricity outage. The storage system also has the added benefit of helping all

ratepayers to save money since it will be used by the Compact to reduce the region's peak demand.

The CVEO's focus will be on serving low- and moderate- income customers. These customer groups currently install and utilize renewable energy technologies at low rates compared to other customers. This is due to the reality that low- and moderate- income customers do not have the means to afford the high up-front cost of these technologies and often do not qualify for loans or other types of financing. If positive, meaningful progress in the effort to mitigate climate change is to be achieved, access to green energy technology must also be made available to the underserved economic and social sectors of our region and our state.

Moreover, the technology package provided in the CVEO is in alignment with recent changes to the Green Communities Act of 2008. The amendments to the act expand the permissible scope of energy efficiency plans to include strategic electrification, energy storage and other active demand technologies and programs that result in customers converting to renewable energy sources.

The Compact's proposed CVEO is the logical next step in moving our region toward a greater reliance on clean energy and reduced carbon emissions. It provides the means, and incentive, for customers to convert to green technologies who do not currently have the resources to make such an investment. For the reasons stated above, APCC respectfully requests that the Department of Public Utilities to approve the Compact's petition.

Sincerely,



Andrew Gottlieb
Executive Director

cc: Sarah Smegal, Hearing Officer
Jeffrey M. Bernstein, Esq.
Audrey A. Eidelman, Esq.