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To: Bernstein, Barbara
Subject: Dry Chips

Hello. We here at Lyme Green Heat support the proposed rebate increases to the Bulk Fed Pellet Boiler Rebate Program, both residential and commercial. We do however oppose the possible change that would include other types of biomass such as dry wood chips. Below are our comments on this.

- No governing body to insure consumer protection
- No dry chip standards and specifications or independent testing procedure or policy related to storage and handling
- Green chips can meet emissions requirements by adding additional exhaust filters. Adding dry chips to the program may encourage other types of biomass "want in" and this could set precedent for them to be included. This could become a slippery slope for the PUC
- The PUC has already given rebates for wood pellet systems that never burned a pellet and immediately started burning dry chips. Other pellet boiler systems have been switched to dry chips.
- Cost related to installing chip systems are higher due to more complicated storage and handling. This in turn uses more funds for few projects.
- The PUC has recently awarded a grant to one company working on developing dry chips. The PUC has not given any bulk pellet delivery company specific money but instead created an appliance program to help grow the delivery industry. Adding dry chip to the program is basically taking PUC funding away from those bulk delivery company's
- The PUC spent months of research and development to create the Bulk Fuel Fed Wood Pellet Boiler and Furnace Program, so inclusion of another fuel should require a complete review of the program, its criteria and administration. Adding dry chips will chew away at the growth of the bulk pellet delivery market in its time of need.
- The public already confuses Green Wood chips and pellets. The wood pellet central heating market is still young and does not need to create more confusion related to the fuel. We also do not need bad press from a new product that may experience some growing pains.
- Having two very different fuels included in one program will create conflicting opinions of what fuel is the better fuel

- PUC program was designed to grow the bulk wood pellet delivery market and the commercial/municipal wood pellet market creates an anchor for the residential delivery market. Burning of chips of any kind will never happen in the residential market and will never have a residential delivery market.
- Different biomass fuels sell for different prices and in turn have different ROI on equipment and installation. Program criteria has been set based on system cost and fuel cost, this ratio will not necessarily work when applied other types of biomass boilers and biomass fuels

Respectfully submitted,

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