MassDEP GHG Reporting Program Summary Report For Retail Sellers of Electricity Emissions Year 2019

JUNE 2022

The information below summarizes the 2019 greenhouse gas (GHG) emissions and megawatt hours (MWh) of electricity sales in Massachusetts by the 104 retail sellers that sold electricity in Massachusetts during that year. Retail sellers of electricity in Massachusetts are required to report this information to the Massachusetts Department of Environmental Protection (MassDEP) under regulation 310 CMR 7.75. MassDEP uses this information in considering measures to reduce emissions from the electric sector. This was the eleventh² year of emissions reporting by retail sellers of electricity, and the second year of reporting under regulation 310 CMR 7.75. Data and comparisons from the first nine reporting years under 310 CMR 7.71 are provided in the summary reports for 2008 and 2010-2017. Changes to the regulation and the methodology for calculating emission factors make data from before 2018 not comparable with data since 2018; therefore, this summary only includes data beginning with 2018.

MassDEP requires retail sellers to report emissions that occur from the generation of the electricity that they sell. The GHGs emitted from power plants during combustion of fuels to generate electricity are carbon dioxide (CO₂), methane (CH₄) and nitrous oxide (N₂O). Biogenic and non-biogenic GHG emissions are reported separately. Biogenic GHG emissions are emissions of CO₂ that result from the combustion of biogenic (plant or animal) material, excluding fossil fuels. Non-biogenic GHG emissions include CO₂ released from the combustion of non-biogenic fuel, plus CH₄ and N₂O released from the combustion of any fuel.

The retail seller reporting process consists of 4 steps:

- Step 1. Unit-Specific Generation: Retail sellers report the use of MWh from unit-specific generation and any associated emissions.
- Step 2. Initial GHG Emission Factors: MassDEP develops initial GHG emission factors in terms of pounds of non-biogenic and biogenic GHGs in carbon dioxide equivalents per megawatt hour (lb CO₂e/MWh) based on all the electricity consumed in Massachusetts.
- Step 3. Final GHG Emission Factors: MassDEP develops final GHG emission factors for the electricity consumed in Massachusetts that was not reported in Step 1, by removing the MWh and emissions reported in Step 1 from the initial emission factors developed in Step 2.
- Step 4. GHG Emissions: Retail sellers report their GHG emissions by multiplying the final emission factors in Step 3 by their electricity sold and not reported in Step 1, and then adding emissions reported in Step 1.

¹ Additional information about MassDEP's GHG reporting program is available at https://www.mass.gov/guides/massdep-greenhouse-gas-emissions-reporting-program; see particularly *Retail Seller of Electricity Reporting*.

² 2017 was the final reporting year under 310 CMR 7.71. Beginning with 2018 calendar year emissions, retail sellers began reporting under 310 CMR 7.75(9).

³ The summary reports may be found at: https://www.mass.gov/lists/massachusetts-greenhouse-gas-ghg-reporting-program-data#retail-seller-ghg-emissions-reports-.

This summary document reports data as calculated and/or corrected by MassDEP, and not necessarily as reported by retail sellers (as discussed further below).

Step 1: Unit-Specific Generation Reported by Retail Sellers

The purpose of reporting unit-specific generation is to assign to each retail seller the MWh and associated emissions from the unit-specific electricity claimed by each through ownership of the unit, contract for the power, or the purchase of certificates. Under 310 CMR 7.75, this report is mandatory for electric utilities and competitive suppliers and optional for municipal electric departments and light boards (MEDs).⁴ Table 1 shows the number of retail sellers reporting MWh from specific generating units in 2018.

Table 1. Number of Retail Sellers Reporting MWh from Unit-Specific Generation

	Electric Utilities	Competitive Suppliers	Municipal Electric Departments	Total Retail Sellers
2018	all 3	62 of 65	all 40	105 of 108
2019	all 3	56 of 61 ⁵	all 40	99 0f 104

MWh and emissions from specific electricity generating units retired by electric utilities and competitive suppliers are reported through their annual 'Renewable Portfolio Standard/Alternative Portfolio Standard/Clean Energy Standard (RPS/APS/CES) Workbook' to the Massachusetts Department of Energy Resources (DOER).^{6,7} Retail sellers are then required to include these MWh and emissions in the mandatory GHG Emissions report. The reporting of MWh from specific electricity generating units by MEDs is still done through the submittal of an optional unit-specific generation report to MassDEP.

Figures 1 through 3 show the total retail sales and unit-specific generation by retail seller type for 2018 and 2019: Figure 1 shows the total retail sales; Figure 2 shows the total MWh from unit-specific generation; and Figure 3 shows the ratio of unit-specific generation to total retail sales. Figures 4 and 5 show the amount of emitting and non-emitting unit-specific generation retired by retail seller type for 2019 in MWh and as a percent of total.

⁴ In this document, Municipal Electric Departments and Municipal Light Boards are collectively referred to as municipal electric departments (MEDs).

⁵ Sixty-one competitive suppliers sold retail electricity in Massachusetts in 2019. Five of these competitive suppliers (Agera, BPCC/Great Eastern Energy, Hampshire Council of Governments, Summer Energy and Utility Expense Reduction) failed to report their 2019 unit-specific generation. It is MassDEP's understanding that four of these competitive suppliers no longer operate in MA. MassDEP worked with the fifth supplier to improve their future submittals.

⁶ Certificates are required for compliance with DOER's Renewable Energy Portfolio Standard (RPS) https://www.mass.gov/renewable-energy-portfolio-standard and Alternative Energy Portfolio Standard (APS) https://www.mass.gov/alternative-energy-portfolio-standard programs, and MassDEP's Clean Energy Standard (CES) program https://www.mass.gov/guides/clean-energy-standard-310-cmr-775.

⁷ For more details on Step 1 of the GHG reporting process in Massachusetts, see https://www.mass.gov/how-to/aq-31-32-retail-seller-of-electricity-greenhouse-gas-emissions-reporting.



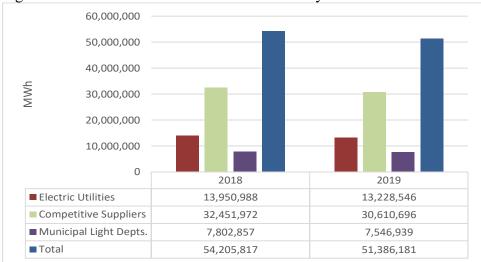


Figure 2. MWh reported from Unit-Specific Generation

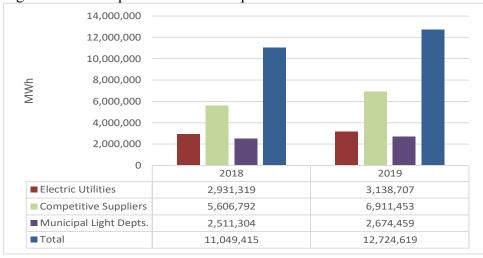
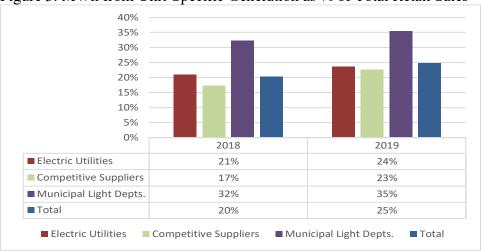
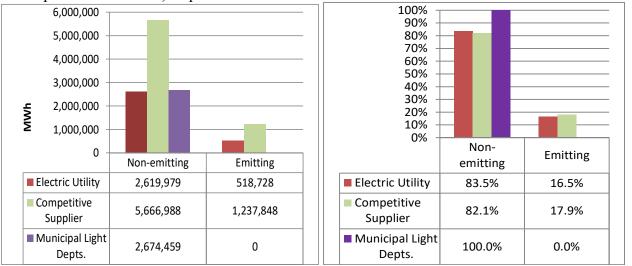


Figure 3. MWh from Unit-Specific Generation as % of Total Retail Sales



Figures 4 and 5. Unit-Specific Non-emitting and Emitting Generation (as MWh and as Percent of

Unit-Specific Generation) Reported for 2019



Details on the MWh reported by retail sellers from specific generating units can be found in Appendix 2A: *Optional Unit-Specific Generation Reported by MEDs for 2019* and Appendix 2B: *Unit-Specific Generation from GIS certificates*⁸ *Reported by Electric Utilities and Competitive Suppliers for 2019*.

Steps 2 and 3: GHG Emission Factors

Table 2 shows the initial (Step 2) and final (Step 3) emission factors upon which retail seller GHG emissions are based. The combined non-biogenic and biogenic emission factors have been included in this summary report for informational purposes. (Please note that Table 2 presents wholesale emission factors. Consumers of electricity that want to use Massachusetts-specific emission factors to report their GHG emissions from electricity use should see Appendix 3: 2019 Retail Level Emission Factors for Use by Consumers of Electricity to Report Greenhouse Gas Emissions (Massachusetts-based Emission Factors) for appropriate values.)

For an explanation of the methodology used to calculate the initial emission factors, and of the "Massachusetts-based" and "Regional" approaches used to calculate the emission factors in Table 2, see *Draft 2019 Greenhouse Gas (GHG) Emission Factors to be used by Retail Sellers of Electricity Reporting under 310 CMR 7.75(9)(c)* "Greenhouse Gas Emissions Reporting." ⁹

The RPS regulation requires electric utilities and competitive suppliers to retire certificates from emitting unit-specific generation, including municipal solid waste (MSW). ¹⁰ Therefore, electric utilities and competitive suppliers are required to claim these certificates in their unit-specific generation reports. Because MSW emissions make up the major portion of biogenic emissions,

⁸ Certificates are created and retired through the New England Power Pool Generation Information System (NEPOOL GIS). NEPOOL GIS "issues and tracks certificates for all MWh of generation and load produced in the ISO New England control area, as well as imported MWh from adjacent control areas." One certificate is generated for each MWh. See https://www.nepoolgis.com/.

⁹ https://www.mass.gov/doc/technical-support-document-draft-2018-ghg-emission-factors/download.

¹⁰ Massachusetts retail sellers retired approximately 90% of the MWh generated in Massachusetts by MSW in 2019.

particularly in Massachusetts, the result is a decrease from the initial biogenic emission factors to the final biogenic emission factors that are applied to non-unit-specific generation, as shown in Table 2.

Table 2. GHG Emission Factors for Electricity Consumed in Massachusetts, prior to and after

accounting for Unit-Specific Generation (lb CO₂e/MWh)

	Massachusetts-based approach			Regional approach				
	Non-Biogenic	Biogenic	Combined	Non-Biogenic	Biogenic	Combined		
Initial Emission Factors: prior to accounting for unit-specific generation (Step 2)								
2018	445	72	517	430	134	564		
2019	416	62	478	402	119	521		
Final Emission Facto	Final Emission Factors: after accounting for unit-specific generation (Step 3)							
2018	486	18	504	445	118	563		
2019	468	8	476	421	104	525		

Step 4: GHG Emissions Reported by Retail Sellers

Most of the 104 retail sellers submitted their GHG emissions reports as shown in Table 3. This summary report reflects the MWh and GHG emissions data for all retail sellers that submitted their emission reports and includes data for the six competitive suppliers that failed to submit either the unit-specific generation report or the GHG emissions report.

Table 3. Number of Retail Sellers Reporting GHG Emissions

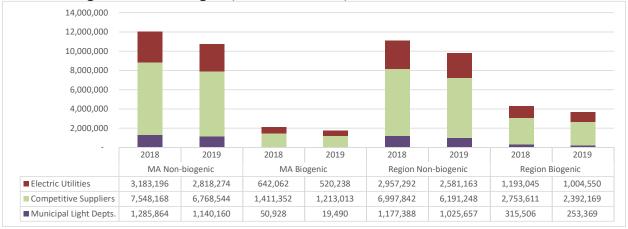
	Electric Utilities	Competitive Suppliers	Municipal Electric Departments	Total Retail Sellers
2018	all 3	58 of 65	all 40	101 of 108
2019	all 3	56 of 61 ¹¹	all 40	99 of 104

Figure 6 shows the total GHG emissions for the three types of retail sellers in 2019. Massachusetts-based and Regional non-biogenic and biogenic GHG emissions decreased from 2018 to 2019. This is due to the decrease in emission factors (see Table 2), the decrease in the total load served in Massachusetts (see Figure 1), and the increase in the amounts of unit-specific generation retired by retail sellers (see Figure 2), much of which is from non-emitting generators.

The information provided in Figures 3, 5 and 6 should not be used to draw comparisons between the three types of retail sellers because electric utilities and competitive suppliers are subject to two requirements that MEDs are not: 1. reporting all unit-specific electricity generation and 2. retiring MSW certificates, which causes electric utilities and competitive suppliers to have higher relative emissions than MEDs.

¹¹ Five competitive suppliers (Agera, BPCC/Great Eastern Energy, Devonshire, Hampshire Council of Governments, and Utility Expense Reduction) failed to report their 2019 GHG emissions. It is MassDEP's understanding that these competitive suppliers no longer operate in MA.

Figure 6. GHG Emissions Reported by Retail Seller Type and Year using the Massachusetts-based and Regional methodologies (Short Tons CO₂e)



The GHG emissions for each retail seller can be found in Appendix 1: 2019 Individual Retail Seller GHG Emissions.

Appendix 1: 2019 Individual Retail Seller GHG Emissions

Below are GHG emissions for each retail seller calculated by MassDEP based on:

- the final GHG emission factors,
- MWh reported as retail load to MassDEP for compliance with the Clean Energy Standard by electric utilities and competitive suppliers and to the Department of Public Utilities (DPU) by MEDs, less MWh reported from unit-specific generation, and
- GHG emissions reported from unit-specific generation, as adjusted by MassDEP. 12 Competitive suppliers that failed to submit reports as noted above, or that failed to re-submit corrected reports, are marked with an asterisk. GHG emissions were calculated for these retail sellers.

Table 4. 2019 Massachusetts Retail Seller GHG Emissions (Short Tons CO₂e)

	Massach	usetts-based	approach	Re	gional appro	oach
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined
Electric Utilities						
Unitil (Fitchburg Gas & Electric Co.)	35,665	6,247	41,913	32,680	12,346	45,025
National GRID (Mass. and Nantucket Electric)	1,411,700	277,277	1,688,978	1,292,694	520,354	1,813,048
Eversource/NSTAR Electric Co. and Western MA Electric Cos.	1,370,909	236,714	1,607,622	1,255,789	471,851	1,727,640
Competitive Suppliers						
Agera Energy LLC*	167,792	2,868	170,660	150,941	37,287	188,228
Ambit Northeast, LLC	47,232	12,302	59,534	43,253	20,431	63,683
Astral Energy, LLC	4	0	4	3	1	4
Atlantic Energy LLC	16,838	2,871	19,709	15,420	5,767	21,187
Calpine Energy Solutions LLC	300,229	56,899	357,128	274,876	108,685	383,560
Champion Energy Services	99,014	16,942	115,957	90,683	33,960	124,643
Clean Choice	26,589	4,682	31,271	24,366	9,224	33,589
Clearview Electric, Inc.	19,904	3,405	23,309	18,229	6,826	25,056
Connecticut Municipal Electric Energy Cooperative	25,603	4,196	29,799	23,429	8,636	32,065
Constellation NewEnergy, Inc.	1,612,188	289,279	1,901,467	1,476,482	566,467	2,042,948
Devonshire Energy, LLC*	15,110	4,811	19,921	13,857	7,371	21,228
Direct Energy Business LLC	914,794	161,984	1,076,778	837,392	320,081	1,157,473
Direct Energy Services, LLC	122,648	21,477	144,125	112,258	42,699	154,957
Discount Power, Inc.	4,923	1,056	5,979	4,509	1,902	6,411
Dynegy Energy Services (East), LLC	185,578	30,570	216,148	169,777	62,844	232,621
EDF Energy Services, LLC/ TransCanada	260,676	43,720	304,396	238,648	88,713	327,361
Eligio Energy MA LLC	14,551	2,373	16,924	13,314	4,899	18,213
Energy Plus Holdings	4,787	872	5,659	4,385	1,694	6,078

¹² Alternative Compliance Payments (ACPs) are not considered as part of Retail Seller GHG Reporting, and certificates previously banked with DOER are accounted for in the year they were generated, and therefore result in no MWh being subtracted and no emissions being added to a retail seller's GHG emissions report in Step 4.

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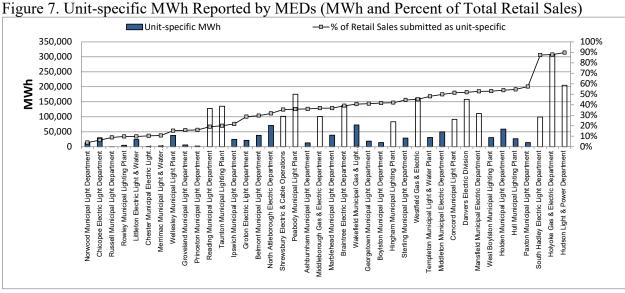
	Massachusetts-based approach			Re	egional appro	oach
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined
ENGIE Resources, LLC	760,414	140,261	900,675	695,305	273,250	968,555
ENGIE Retail, LLC (dba	25,708	4,230	29,938	23,527	8,685	32,212
Think Energy)						
Everyday Energy LLC	203	36	239	186	71	257
First Point Power	119,948	21,870	141,818	109,790	42,618	152,408
Great Eastern Energy (aka BBPC, LLC)*	32,036	548	32,583	28,818	7,119	35,937
Green Mountain Energy Company	3,547	603	4,149	3,248	1,213	4,461
Hampshire Council of Governments*	2,841	49	2,890	2,556	631	3,188
Harborside Energy of Massachusetts LLC	1,104	159	1,264	1,008	356	1,364
Harvard Dedicated Energy, Ltd.	32,567	557	33,123	29,296	7,237	36,533
Hudson Energy Services	159,527	32,337	191,865	145,937	60,096	206,033
Inspire Energy Holdings,	34,463	15,401	49,864	31,553	21,344	52,898
LLC	-		,	-	ŕ	
Interstate Gas Supply, Inc. (dba IGS Energy)	33,541	6,385	39,926	30,744	12,098	42,842
Just Energy Mass. Corp.	22,352	3,620	25,972	20,450	7,506	27,955
Liberty Power Holdings	83,956	6,133	90,088	76,021	22,340	98,361
Linde-Messer Energy	3,059	537	3,596	2,803	1,060	3,863
Services*						
Major Energy Electric Service, LLCs	21,269	3,465	24,733	19,461	7,158	26,618
Massachusetts Gas & Electric Co.	26,274	4,525	30,799	24,066	9,034	33,100
Mega Energy Holdings, LLC	12,448	1,970	14,418	11,384	4,144	15,528
National Gas & Electric, Inc.	12,106	1,855	13,961	11,084	3,943	15,027
NextEra Energy	478,915	84,461	563,377	438,187	167,650	605,838
Nordic Energy Services	454	83	537	416	160	577
Oasis Power, LLC	400	7	407	360	89	449
Palmco Power MA, LLC	13,660	3,923	17,583	12,503	6,286	18,789
Provider Power MASS, LLC	152,755	33,112	185,867	139,740	59,696	199,436
Public Power, LLC	451,354	99,436	550,790	413,403	176,953	590,356
Reliant Energy Northeast	93,838	6,237	100,076	85,934	22,382	108,316
Renaissance Power and Gas	3,892	725	4,617	3,571	1,381	4,952
Residents Energy, LLC	29,881	7,760	37,641	27,379	12,872	40,251
SFE Energy Massachusetts	82,313	23,596	105,908	75,448	37,618	113,066
SmartEnergy Holdings, LLC	14,128	2,590	16,718	12,958	4,981	17,939
South Jersey Energy*	2,161	385	2,546	1,981	753	2,733
Spark Energy, LLC	3,063	315	3,378	2,783	886	3,670
Starion Energy, Inc.	40,262	6,838	47,100	36,864	13,778	50,643
Summer Energy*	12,072	2,038	14,110	11,053	4,119	15,172
Sunwave Gas & Power	20,445	2,229	22,673	18,590	6,017	24,607
Massachusetts, Inc.						
Texas Retail Energy	20,516	4,782	25,299	18,774	8,340	27,115
Titan Gas and Power	1,888	313	2,201	1,728	640	2,368
Town Square Energy, LLC	24,248	5,502	29,750	22,211	9,663	31,874

	Massachusetts-based approach			Regional approach			
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined	
Utility Expense Reduction*	95	2	97	86	21	107	
Verde Energy USA	36,143	8,082	44,225	33,051	14,397	47,449	
Massachusetts, LLC	-						
Viridian Energy, LLC	46,468	13,425	59,894	42,566	21,397	63,962	
Wattifi, Inc.	6	0	6	6	1	7	
Xoom Energy Massachusetts	13,762	2,324	16,085	12,599	4,698	17,297	
LLC	,			,			
Municipal Electric Departme	nts						
Ashburnham Muni. Light							
Dept.	5,382	92	5,474	4,842	1,196	6,038	
Belmont Municipal Light	•			,	,		
Dept.	21,043	360	21,402	18,929	4,676	23,606	
Boylston Municipal Light	-						
Dept.	4,627	79	4,706	4,162	1,028	5,190	
Braintree Electric Light Dept.	50,290	860	51,149	45,239	11,175	56,415	
Chester Muni. Electric Light					,		
Dept.	1,186	20	1,207	1,067	264	1,331	
Chicopee Electric Light	-			-		-	
Dept.	103,002	1,761	104,763	92,658	22,889	115,547	
Concord Municipal Light					,	,	
Plant	20,249	346	20,596	18,216	4,500	22,716	
Danvers Electric Division	34,410	588	34,999	30,955	7,647	38,601	
Georgetown Municipal Light							
Dept.	6,283	107	6,390	5,652	1,396	7,048	
Groton Electric Light Dept.	12,615	216	12,831	11,348	2,803	14,152	
Groveland Municipal Light							
Dept.	7,554	129	7,684	6,796	1,679	8,475	
Hingham Municipal Lighting							
Plant	26,892	460	27,352	24,191	5,976	30,167	
Holden Municipal Light							
Dept.	11,822	202	12,024	10,635	2,627	13,262	
Holyoke Gas & Electric							
Dept.	9,880	169	10,049	8,888	2,196	11,084	
Hudson Light & Power Dept.	5,559	95	5,654	5,001	1,235	6,236	
Hull Municipal Lighting							
Plant	5,281	90	5,371	4,751	1,174	5,924	
Ipswich Municipal Light							
Dept.	20,796	355	21,151	18,707	4,621	23,328	
Littleton Electric Light &							
Water	52,232	893	53,125	46,986	11,607	58,593	
Mansfield Municipal Electric							
Dept.	23,234	397	23,631	20,900	5,163	26,063	
Marblehead Municipal Light	1	0.55	15000	14005	2.150	15 155	
Dept.	15,570	266	15,836	14,006	3,460	17,466	
Merrimac Muni. Light &	<i>-</i>	105			1.20=	- 000	
Water	6,243	107	6,349	5,616	1,387	7,003	
Middleborough Gas & Elec.	40.555	602	41.240	26.402	0.012	45.404	
Dept.	40,555	693	41,248	36,482	9,012	45,494	
Middleton Muni. Electric	11.654	100	11.053	10.404	2.500	12.074	
Dept.	11,654	199	11,853	10,484	2,590	13,074	

	Massachi	usetts-based	approach	Re	gional appro	oach
	Non- Biogenic	Biogenic	Combined	Non- Biogenic	Biogenic	Combined
North Attleboro Electric						
Dept.	35,954	615	36,569	32,343	7,990	40,333
Norwood Municipal Light						
Dept.	74,764	1,278	76,042	67,255	16,614	83,870
Paxton Municipal Light						
Dept.	2,402	41	2,443	2,160	534	2,694
Peabody Municipal Light						
Plant	73,385	1,254	74,640	66,015	16,308	82,323
Princeton Municipal Light						
Dept.	3,104	53	3,158	2,793	690	3,483
Reading Municipal Light						
Dept.	126,295	2,159	128,454	113,611	28,065	141,677
Rowley Municipal Lighting						
Plant	10,186	174	10,361	9,163	2,264	11,427
Russell Municipal Light						
Dept.	1,042	18	1,059	937	231	1,168
Shrewsbury Electric & Cable						
Ops.	43,516	744	44,260	39,146	9,670	48,816
South Hadley Electric Light						
Dept.	3,340	57	3,397	3,005	742	3,747
Sterling Municipal Light						
Dept.	8,373	143	8,516	7,532	1,861	9,392
Taunton Municipal Lighting						
Plant	126,691	2,166	128,857	113,968	28,154	142,121
Templeton Muni. Light &						
Water	7,835	134	7,969	7,048	1,741	8,790
Wakefield Muni. Gas &						
Light	24,895	426	25,320	22,395	5,532	27,927
Wellesley Municipal Light						
Plant	49,489	846	50,335	44,519	10,997	55,516
West Boylston Muni. Light.						
Plant	6,338	108	6,447	5,702	1,409	7,110
Westfield Gas & Electric	46,193	790	46,982	41,554	10,265	51,819
2019 Electric Utility Total	2,818,274	520,238	3,338,512	2,581,163	1,004,550	3,585,713
2019 Competitive Supplier	6,768,544	1,213,013	7,981,556	6,191,248	2,392,169	8,583,418
Total	, , , ,		, , , , , ,			
2019 MED Total	1,140,160	19,490	1,159,650	1,025,657	253,369	1,279,026
2019 RETAIL SELLER	10,726,978	1,752,741	12,479,719	9,798,068	3,650,089	13,448,157
TOTAL	10,720,770	1,752,771	12,175,715	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	2,020,007	13,110,137
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Appendix 2A: Optional Unit-Specific Generation Reported by MEDs for 2019

Below is a summary of the 2019 data that MEDs chose to submit from unit-specific generation. All unit-specific generation submitted by MEDs in 2019 was non-emitting. Figures 7 and 8 show the unit-specific MWh reported by each MED and the ratio of their unit-specific MWh to their retail sales. MEDs are presented in order of increasing percentage of unit-specific generation reported. Figure 7 compares the unit-specific MWh reported as a percentage of total retail sales. Figure 8 shows the variation in total MWh sales. See Table 5 for individual MED values used in Figures 7 and 8. Table 6 shows the individual MED lb CO₂e/MWh emission rates (GHG emissions divided by retail load).



☐ Retail Sales MWh minus unit-specific MWh ■ Unit-specific MWh 700,000 600,000 500,000 400,000 300,000 200.000 100,000 Norwood Municipal Light Department Chicopee Electric Light Department Russell Municipal Light Department Rowley Municipal Lighting Plant Littleton Electric Light & Water Chester Municipal Electric Light Department Merrimac Municipal Light & Water Department Wellesley Municipal Light Plant Groveland Municipal Light Department Princeton Municipal Light Department Reading Municipal Light Department Taunton Municipal Lighting Plant Ipswich Municipal Light Department Groton Electric Light Department Belmont Municipal Light Department North Attleborough Electric Department Shrewsbury Electric & Cable Operations Peabody Municipal Light Plant Ashburnham Municipal Light Department Middleborough Gas & Electric Department Marblehead Municipal Light Department Braintree Electric Light Department Wakefield Municipal Gas & Light Department Georgetown Municipal Light Department Boylston Municipal Light Department Hingham Municipal Lighting Plant Sterling Municipal Light Department Westfield Gas & Electric Templeton Municipal Light & Water Plant Middleton Municipal Electric Department Concord Municipal Light Plant Danvers Electric Division West Boylston Municipal Lighting Plant Holden Municipal Light Department Paxton Municipal Light Department South Hadley Electric Light Department Holyoke Gas & Electric Department Hudson Light & Power Department Mansfield Municipal Electric Department

Figure 8. Electricity Sales by MED: Unit-Specific MWh vs. Total Retail Sales MWh

Table 5. Individual 2019 MED Percent of Sales Claimed as Unit-Specific Generation

		Sales Claimed as Unit-Specific Generation MWh claimed as unit-			
	MWh	specific gene	% of sales claimed as unit-		
	reported as retail sales	non-emitting	emitting	specific generation	
Ashburnham Muni. Light Dept.	35,904	12,903	0	35.9%	
Belmont Municipal Light Department	127,977	38,051	0	29.7%	
Boylston Municipal Light Dept.	33,865	14,093	0	41.6%	
Braintree Electric Light Dept.	353,025	138,112	0	39.1%	
Chester Municipal Electric Light Dept.	5,662	592	0	10.5%	
Chicopee Electric Light Dept.	470,264	30,084	0	6.4%	
Concord Municipal Light Plant	177,858	91,322	0	51.3%	
Danvers Electric Division	305,324	158,271	0	51.8%	
Georgetown Municipal Light Department	45,533	18,683	0	41.0%	
Groton Electric Light Dept.	75,542	21,631	0	28.6%	
Groveland Municipal Light Dept.	38,334	6,050	0	15.8%	
Hingham Municipal Lighting Plant	198,423	83,500	0	42.1%	
Holden Municipal Light Dept.	109,593	59,071	0	53.9%	
Holyoke Gas & Electric Dept.	350,372	308,148	0	87.9%	
Hudson Light & Power Dept.	228,853	205,097	0	89.6%	
Hull Municipal Lighting Plant	49,638	27,069	0	54.5%	
Ipswich Municipal Light Department	113550	24,680	0	21.7%	
Littleton Electric Light & Water	247,658	24,445	0	9.9%	
Mansfield Municipal Electric Dept.	210,387	111,098	0	52.8%	
Marblehead Municipal Light Dept.	105,397	38,859	0	36.9%	
Merrimac Municipal Light & Water Dept.	29,893	3,215	0	10.8%	
Middleborough Gas & Electric Dept.	274,519	101,208	0	36.9%	
Middleton Municipal Electric Dept.	99,544	49,740	0	50.0%	
North Attleboro Electric Dept.	224,952	71,302	0	31.7%	
Norwood Municipal Light Dept.	332,561	13,058	0	3.9%	
Paxton Municipal Light Dept.	24,083	13,820	0	57.4%	
Peabody Municipal Light Plant	488,885	175,273	0	35.9%	
Princeton Municipal Light Dept.	15,805	2,538	0	16.1%	
Reading Municipal Light Dept.	667,139	127,418	0	19.1%	
Rowley Municipal Lighting Plant	48,243	4,711	0	9.8%	
Russell Municipal Light Department	4,885	434	0	8.9%	
Shrewsbury Electric & Cable Ops.	287,612	101,647	0	35.3%	
South Hadley Electric Light Dept.	113,767	99,492	0	87.5%	
Sterling Municipal Light Dept.	64,591	28,811	0	44.6%	
Taunton Municipal Lighting Plant	676,629	135,214	0	20.0%	
Templeton Municipal Light & Water	64,469	30,985	0	48.1%	
Wakefield Municipal Gas & Light Dept.	179,178	72,790	0	40.6%	
Wellesley Municipal Light Plant	249,531	38,041	0	15.2%	
West Boylston Municipal Lighting Plant	57,706	30,619	0	53.1%	
Westfield Gas & Electric	359,788	162,384	0	45.1%	
MED Total	7,546,939	2,674,459	0	35.4%	

Table 6. Individual 2019 MED Emission Factors (lb CO₂e/MWh)

	Massachusetts-b	ased approach	Regional approach		
	Non-Biogenic	Biogenic	Non-Biogenic	Biogenic	
Final 2019 Retail Seller Emission Factors from Table 2 (applied only to non-unit- specific generation - shown for comparison)	468	8	421	104	
Ashburnham Muni. Light Dept.	300	5	270	67	
Belmont Municipal Light Department	329	6	296	73	
Boylston Municipal Light Dept.	273	5	246	61	
Braintree Electric Light Dept.	285	5	256	63	
Chester Municipal Electric Light Dept.	419	7	377	93	
Chicopee Electric Light Dept.	438	7	394	97	
Concord Municipal Light Plant	228	4	205	51	
Danvers Electric Division	225	4	203	50	
Georgetown Municipal Light Department	276	5	248	61	
Groton Electric Light Dept.	334	6	300	74	
Groveland Municipal Light Dept.	394	7	355	88	
Hingham Municipal Lighting Plant	271	5	244	60	
Holden Municipal Light Dept.	216	4	194	48	
Holyoke Gas & Electric Dept.	56	1	51	13	
Hudson Light & Power Dept.	49	1	44	11	
Hull Municipal Lighting Plant	213	4	191	47	
Ipswich Municipal Light Department	366	6	329	81	
Littleton Electric Light & Water	422	7	379	94	
Mansfield Municipal Electric Dept.	221	4	199	49	
Marblehead Municipal Light Dept.	295	5	266	66	
Merrimac Municipal Light & Water Dept.	418	7	376	93	
Middleborough Gas & Electric Dept.	295	5	266	66	
Middleton Municipal Electric Dept.	234	4	211	52	
North Attleboro Electric Dept.	320	5	288	71	
Norwood Municipal Light Dept.	450	8	404	100	
Paxton Municipal Light Dept.	199	3	179	44	
Peabody Municipal Light Plant	300	5	270	67	
Princeton Municipal Light Dept.	393	7	353	87	
Reading Municipal Light Dept.	379	6	341	84	
Rowley Municipal Lighting Plant	422	7	380	94	
Russell Municipal Light Department	426	7	384	95	
Shrewsbury Electric & Cable Ops.	303	5	272	67	
South Hadley Electric Light Dept.	59	1	53	13	
Sterling Municipal Light Dept.	259	4	233	58	
Taunton Municipal Lighting Plant	374	6	337	83	
Templeton Municipal Light & Water	243	4	219	54	
Wakefield Municipal Gas & Light Dept.	278	5	250	62	
Wellesley Municipal Light Plant	397	7	357	88	
West Boylston Municipal Lighting Plant	220	4	198	49	
Westfield Gas & Electric	257	4	231	57	
Average MED Emission Factors	302	5	272	67	

Figures 9 and 10 show the MWh reported by MEDs from unit-specific generation by fuel and reporting type and by location and reporting type. Figures 11, 12 and 13 show the unit-specific generation reported by MEDs as a percent by fuel, by location and by reporting type. Information on GHG emissions of each MED can be found in Appendix 1: 2019 Individual Retail Seller GHG Emissions.

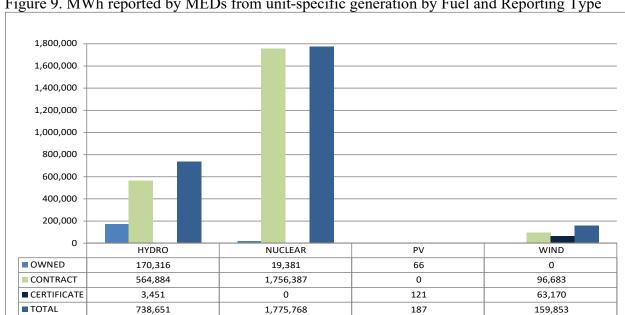
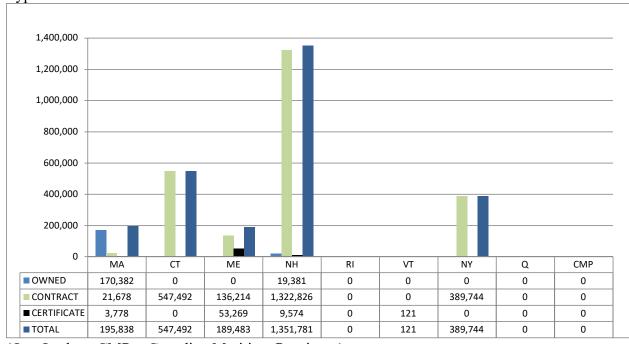


Figure 9. MWh reported by MEDs from unit-specific generation by Fuel and Reporting Type

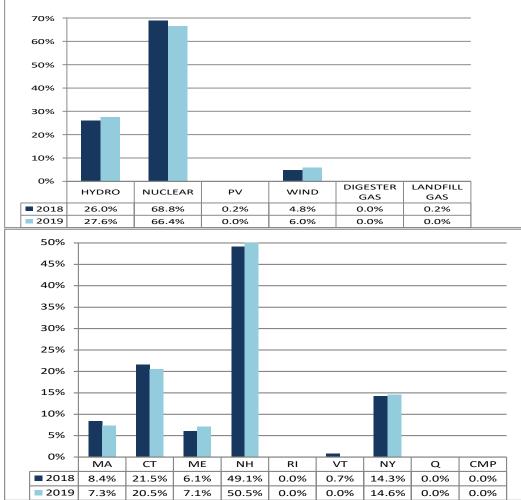
Figure 10. MWh reported by MEDs from unit-specific generation by Location and Reporting Type



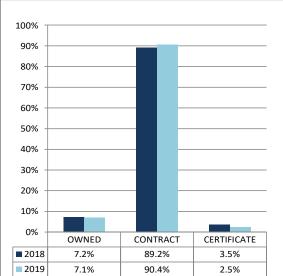
(Q = Quebec; CMP = Canadian Maritime Provinces)

Figures 11, 12 and 13. MWh reported by MEDs from unit-specific generation as Percent by Fuel

Type, by Location and by Reporting Type







Appendix 2B: Unit-Specific Generation from GIS Certificates Reported by Electric **Utilities and Competitive Suppliers for 2019**

Below is a summary of the 2019 data reported by electric utilities and competitive suppliers from unit-specific generation. Because the certificates, by state and fuel type, purchased by electric utilities and competitive suppliers for compliance 13 with various programs are already included in the RPS/APS/CES Annual Compliance Reports, ¹⁴ that information is not repeated in this summary. The use of banked certificates or payments¹⁵ by electric utilities and competitive suppliers to meet their compliance requirements with these programs are not reflected in this summary.

"N/A" appears in the unit-specific generation columns for competitive suppliers that did not submit any unit-specific information. Competitive suppliers that failed to submit, or to correct, a unit specific or GHG emissions report are marked with an asterisk.

Table 7: Individual 2019 Electric Utility and Competitive Supplier Percent of Sales Claimed as

Unit-Specific Generation

The Specific Generation	MWh reported as	specific generation		% of sales claimed as
	retail sales	non- emitting	emitting	unit-specific generation
Electric Utilities				
Unitil (Fitchburg Gas & Electric Co.)	168,462	35,409	6,000	24.6%
National GRID (Mass. and Nantucket Electric)	6,561,377	1,211,554	285,728	22.8%
Eversource/NSTAR Electric Co. and Western MA				
Electric Cos.	6,498,707	1,373,016	227,000	24.6%
Competitive Suppliers				
Agera Energy LLC*	717,060	N/A	N/A	0%
Ambit Northeast, LLC	221,766	38,723	13,705	23.6%
Astral Energy, LLC	15	0	0	0.0%
Atlantic Energy LLC	75,892	12,809	2,750	20.50%
Calpine Energy Solutions LLC	1,323,917	187,144	57,915	18.5%
Champion Energy Services	445,941	75,178	16,231	20.5%
Clean Choice	129,776	30,670	4,500	27.1%
Clearview Electric, Inc.	93,182	18,645	3,262	23.5%
Connecticut Municipal Electric Energy Cooperative	115,491	18,983	4,000	19.9%
Constellation NewEnergy, Inc.	7,789,306	1,730,076	284,486	25.9%
Devonshire Energy, LLC*	71,379	12,301	5,752	25.3%
Direct Energy Business LLC	4,211,537	758,455	159,399	21.8%
Direct Energy Services, LLC	572,390	109,116	21,136	22.8%
Discount Power, Inc.	23,071	4,310	1,128	23.6%
Dynegy Energy Services (East), LLC	845,351	143,636	29,330	20.5%
EDF Energy Services, LLC/ TransCanada	1,189,256	210,112	41,791	21.2%
Eligio Energy MA LLC	67,008	12,114	2,260	21.5%
Energy Plus Holdings	21,424	3,433	862	20.0%
ENGIE Resources, LLC	3,508,858	593,839	144,418	21.0%

¹³ Retired certificates from units that produce thermal energy are not reported for the purpose of calculating GHG

¹⁴ These reports can be found at https://www.mass.gov/service-details/annual-compliance-reports.

¹⁵ See footnote 12.

	MWh claimed as un specific generation			% of sales claimed as
	reported as	non-	eneration	unit-specific
	retail sales	emitting	emitting	generation
ENGIE Retail, LLC (dba Think Energy)	117,170	20,328	4,035	20.8%
Everyday Energy LLC	955	199	34	24.4%
First Point Power	560,036	106,021	21,768	22.8%
Great Eastern Energy (aka BBPC, LLC)*	136,904	N/A	N/A	0%
Green Mountain Energy Company	15,813	2,520	577	19.59%
Hampshire Council of Governments*	12,143	N/A	N/A	0%
Harborside Energy of Massachusetts LLC	4,905	665	149	16.6%
Harvard Dedicated Energy, Ltd.	172,426	33,252	0	19.3%
Hudson Energy Services	736,292	123,551	34,436	21.5%
Inspire Energy Holdings, LLC	161,223	17,406	20,000	23.2%
Interstate Gas Supply, Inc. (dba IGS Energy)	158,111	32,721	6,365	24.7%
Just Energy Mass. Corp.	101,682	17,278	3,446	20.4%
Liberty Power Holdings	393,150	50,498	5,000	14.1%
Major Energy Electric Service, LLCs	99,247	19,007	3,301	22.5%
Massachusetts Gas & Electric Co.	123,920	25,638	4,338	24.2%
Mega Energy Holdings, LLC	53,267	6,105	1,870	15.0%
Messer/Linde Energy Services	14,456	3,042	515	24.6%
National Gas & Electric, Inc.	56,637	11,182	1,946	23.2%
NextEra Energy	2,206,741	389,567	84,064	21.5%
Nordic Energy Services	2,221	539	80	27.9%
Oasis Power, LLC	1,939	229	0	11.8%
Palmco Power MA, LLC	62,766	9,039	4,504	21.6%
Provider Power MASS, LLC	711,556	121,514	36,214	22.2%
Public Power, LLC	2,118,633	396,391	107,302	23.8%
Reliant Energy Northeast	416,338	64,457	15,533	19.2%
Renaissance Power and Gas	18,278	3,903	700	25.2%
Residents Energy, LLC	142,656	27,314	8,836	25.3%
SFE Energy Massachusetts	371,574	51,884	27,558	21.4%
SmartEnergy Holdings, LLC	60,898	8,590	2,500	18.2%
South Jersey Energy*	10,127	2,086	370	24.3%
Spark Energy, LLC	13,224	1,034	279	9.9%
Starion Energy, Inc.	186,34516	35,195	6,565	22.4%
Summer Energy*	56,162	10,866	1,950	22.8%
Sunwave Gas & Power Massachusetts, Inc.	92,634	11,717	2,000	14.8%
Texas Retail Energy	92,106	12,643	5,342	19.5%
Titan Gas and Power	8,535	1,432	299	20.3%
Town Square Energy, LLC	115,591	22,905	5,998	25.0%
Utility Expense Reduction*	408	N/A	N/A	0%
Verde Energy USA Massachusetts, LLC	168,351	27,793	8,993	21.9%
Viridian Energy, LLC	218,922	37,020	15,828	24.1%
Wattifi, Inc.	27	0	0	0%
Xoom Energy Massachusetts LLC	60,222	8,530	2,228	17.9%
Electric Utility Total	13,228,546	2,619,979	518,728	23.7%
Competitive Supplier Total	30,610,696	5,673,605	1,237,848	22.6%

Table 8 shows the individual electric utility and competitive supplier lb CO₂e/MWh emission rates (GHG emissions divided by retail load). The emission factors for individual electric utilities

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¹⁶ MassDEP edit made to correct typo in submitted retail sales value.

and competitive suppliers in Table 8 should not be compared to the emission factors calculated for MEDs in Table 6 in Appendix 2A: *Optional Unit-Specific Generation Reported by MEDs for 2019*, because the requirement to retire MSW certificates ¹⁷ causes electric utilities and competitive suppliers to have higher emission factors than MEDs.

Table 8: Individual 2019 Emission Factors for Electric Utilities and Competitive Suppliers (lb CO_2e/MWh)

	Massachuse appro		Regional ap	proach
	Non-Biogenic	Biogenic	Non-Biogenic	Biogenic
Final 2019 Retail Seller Emission Factors from Table 2 (applied only to non-unit-specific generation - shown for comparison)	468	8	421	104
Electric Utilities				
Unitil (Fitchburg Gas & Electric Co.)	423	74	388	147
National GRID (Mass. and Nantucket Electric)	430	85	394	159
Eversource/NSTAR Electric Co. and Western MA	422	73	386	145
Electric Cos.		, -		
Competitive Suppliers	<u>.</u>			
Agera Energy LLC*	468	8	421	104
Ambit Northeast, LLC	426	111	390	184
Astral Energy, LLC	468	8	421	104
Atlantic Energy LLC	444	76	406	152
Calpine Energy Solutions LLC	454	86	415	164
Champion Energy Services	444	76	407	152
Clean Choice	410	72	376	142
Clearview Electric, Inc.	427	73	391	147
Connecticut Municipal Electric Energy	443	73	406	150
Cooperative		, -		
Constellation NewEnergy, Inc.	414	74	379	145
Devonshire Energy, LLC*	423	135	388	207
Direct Energy Business LLC	434	77	398	152
Direct Energy Services, LLC	429	75	392	149
Discount Power, Inc.	427	92	391	165
Dynegy Energy Services (East), LLC	439	72	402	149
EDF Energy Services, LLC/ TransCanada	438	74	401	149
Eligio Energy MA LLC	434	71	397	146
Energy Plus Holdings	447	81	409	158
ENGIE Resources, LLC	433	80	396	156
ENGIE Retail, LLC (dba Think Energy)	439	72	402	148
Everyday Energy LLC	425	75	389	148
First Point Power	428	78	392	152
Great Eastern Energy (aka BBPC, LLC)*	468	8	421	104
Green Mountain Energy Company	449	76	411	153
Hampshire Council of Governments*	468	8	421	104
Harborside Energy of Massachusetts LLC	450	65	411	145
Harvard Dedicated Energy, Ltd.	378	6	340	84
Hudson Energy Services	433	88	396	163
Inspire Energy Holdings, LLC	428	191	391	265
Interstate Gas Supply, Inc. (dba IGS Energy)	424	81	389	153

¹⁷ See footnote 10.

	Massachusetts-based approach		Regional approach	
	Non-Biogenic	Biogenic	Non-Biogenic	Biogenic
Just Energy Mass. Corp.	440	71	402	148
Liberty Power Holdings	427	31	387	114
Major Energy Electric Service, LLCs	429	70	392	144
Massachusetts Gas & Electric Co.	424	73	388	146
Mega Energy Holdings, LLC	467	74	427	156
Messer/Linde Energy Services	423	74	388	147
National Gas & Electric, Inc.	427	66	391	139
NextEra Energy	434	77	397	152
Nordic Energy Services	409	75	375	144
Oasis Power, LLC	413	7	371	92
Palmco Power MA, LLC	435	125	398	200
Provider Power MASS, LLC	429	93	393	168
Public Power, LLC	426	94	390	167
Reliant Energy Northeast	451	30	413	108
Renaissance Power and Gas	426	79	391	151
Residents Energy, LLC	419	109	384	180
SFE Energy Massachusetts	443	127	406	202
SmartEnergy Holdings, LLC	464	85	426	164
South Jersey Energy*	427	76	391	149
Spark Energy, LLC	463	48	421	134
Starion Energy, Inc.	432	73	396	148
Summer Energy*	430	73	394	147
Sunwave Gas & Power Massachusetts, Inc.	441	48	401	130
Texas Retail Energy	445	104	408	181
Titan Gas and Power	442	73	405	150
Town Square Energy, LLC	420	95	384	167
Utility Expense Reduction*	468	8	421	104
Verde Energy USA Massachusetts, LLC	429	96	393	171
Viridian Energy, LLC	425	123	389	195
Wattifi, Inc.	468	8	421	104
Xoom Energy Massachusetts LLC	457	77	418	156
Average Electric Utility Emission Factors	426	79	390	152
Average Competitive Supplier Emission Factors	442	79	405	156

Appendix 3: 2019 Retail Level Emission Factors for Use by Consumers of Electricity to Report Greenhouse Gas Emissions (Massachusetts-based Emission Factors)

Some electricity consumers have expressed interest in using Massachusetts-specific greenhouse gas (GHG) emission factors (EFs) to report their GHG emissions from use of electricity. The EFs shown earlier in this document are often not appropriate for use by electricity consumers for two reasons: first, the EFs earlier in this document are for the combination of CO₂, CH₄ and N₂O when many electricity consumers seek EFs for the individual gases and, second, the EFs earlier in this document are per wholesale MWh, rather than per retail meter MWh (or kWh) that electricity consumers see on their electric bill. In order to assist electricity consumers in reporting GHGs, this appendix presents the 2019 EFs that consumers of electricity would use to report their GHG emissions at a retail electricity level.

Combined, Biogenic and Non-Biogenic EFs: Progress on achieving the GHG reduction limits in the Global Warming Solutions Act is determined using Massachusetts-based emission calculations. Thus, it is Massachusetts-based EFs that consumers of electricity should use to determine GHG emissions. The Massachusetts-based EFs include all CO₂, CH₄ and N₂O emissions from non-biogenic (fossil) and biogenic (non-fossil) fuels combusted to generate the electricity sold by retail sellers of electricity in Massachusetts. The Combined EF can be determined by adding the Non-Biogenic and Biogenic EFs together.

2019 RS Wholesale Non-Biogenic MA-based	416 lb	Non-Biogenic CO ₂ e/Wholesale
EF	MWh	_
+ 2019 RS Wholesale Biogenic MA-based EF	+ 62 lb	Biogenic CO ₂ e/Wholesale MWh
2019 RS Wholesale Combined MA-based	478 lb	Combined CO ₂ e/Wholesale MWh
EF		

Wholesale v. Retail EFs (line losses): Power lines lose 6% ¹⁸ (on average) of the electricity they carry. The amount of wholesale MWh needed to deliver a particular amount of electricity at the retail level is, therefore, 6% greater than the amount shown on a retail meter. The emissions released to produce the electricity can be spread out over either the larger number of wholesale MWh or the smaller number of retail MWh, such that the retail lb/MWh EF will always be higher than the wholesale lb/MWh EF:

Wholesale Combined EF / (100% of MWh - 6% of MWh due to line losses) = Retail Combined EFSpecifically: 478 lb CO₂e/Wholesale MWh / (1 - 0.06) = 509 lb CO₂e/Retail MWh

Table 9. 2018 Massachusetts-based CO₂e GHG Emission Factors

more y, 2010 Management of the Cart of the Emission 1 website				
	Retail Seller Wholesale Level	Electricity Consumer Retail Level		
	(lb CO ₂ e/Wholesale MWh)	(lb CO ₂ e/Retail MWh)		
Non-Biogenic	416	443		
Biogenic	62	66		
Combined	478	509		

¹⁸ This value was updated to align with the line loss value used in the Interim Massachusetts Clean Energy and Climate Plan for 2030, dated December 2020.

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Individual CO₂, CH₄, and N₂O EFs: If a consumer wants to use EFs by individual gas, then the lb CO₂e/MWh value needs to be separated into the individual components: lb CO₂/MWh, lb CH₄/MWh, and lb N₂O/MWh. MassDEP has separated the three gases by alternately zeroing out the other two gases on the 'Calculating CO₂e' tab of the retail seller EF spreadsheet at https://www.mass.gov/lists/massachusetts-greenhouse-gas-ghg-reporting-program-data#massdep-emission-factor-calculations-. For the 2019 retail level Combined EF, this results in 506 lb of CO₂e from CO₂, 1 lb of CO₂e from CH₄, and 2 lb of CO₂e from N₂O. The global warming potential (GWP) of each gas must then be taken into account to determine the EF for each gas. The GWPs used through 2019 by MassDEP are: 1 for CO₂, 25 for CH₄, and 298 for N₂O.¹⁹

The breakdown of the 509 lb CO₂e/Retail MWh value from Table 9 into individual gases, at various scales of electricity, is shown in Table 10.

Table 10. 2019 Electricity Consumers Retail-level Massachusetts-based CO₂e GHG Emission Factors by Individual Gas

_	CO ₂ e		
	CO_2	CH4	N ₂ O
lb/Retail kWh	0.506	0.000044	0.000006
lb/Retail MWh	506	0.044	0.006
lb/Retail GWh	506,000	44	6

The lb/Retail kWh values in the upper row of Table 10 may be the values most likely to be used by electricity consumers since most electric bills show kWh use.

The breakdown of the 506 lb CO₂/Retail MWh value from Table 10 into its non-biogenic and biogenic components is shown in Table 8. All CH₄ and N₂O emissions are considered non-biogenic and thus cannot be further broken down.

Table 11. 2019 Electricity Consumers Retail-level Massachusetts-based Non-Biogenic and Biogenic CO₂ Emission Factors

	CO_2		
	Non-Biogenic CO ₂	Biogenic CO ₂	
lb/Retail kWh	0.439	0.066	
lb/Retail MWh	439	66	
lb/Retail GWh	439,000	66,000	

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¹⁹ Beginning with the 2014 EFs, MassDEP updated the global warming potentials (GWPs) it uses based on the Intergovernmental Panel on Climate Change's (IPCC's) Fourth Assessment Report (AR4), published in 2007, similar to most other reporting programs. The global GWPs used with earlier EFs were from IPCC's Second Assessment Report (SAR) published in 1996.