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Transmitted electronically via email.

City of Boston Environment Department
1 City Hall Square
Boston, MA 02201

RE: Recommendation Regarding Potential Emissions Reporting Options for District Energy Systems

The Conference of Boston Teaching Hospitals, on behalf of our 12 member hospitals, appreciates the opportunity to submit comments to the City on the potential options for the reporting of emissions from district energy plants that were discussed during the BERDO 2.0 Regulations Phase 2, Working Session #3, on September 21, 2022.

As you know, COBTH's member hospitals provide the highest quality medical care, in addition to training the next generation of physicians and other health providers, and conducting cutting-edge medical research. We believe that the mission of our teaching hospitals and the City's efforts to reduce carbon emissions are aligned, as health status and environmental factors are inextricably linked.

COBTH's 12 member hospitals receive their energy from a variety of sources, including a number of district energy plants. COBTH agrees that the reporting requirements for district energy systems under BERDO should be consistent, and based on a clear, transparent methodology, and free of unfair bias. At this time, however, we feel that our hospital members do not have the information required to comprehensively evaluate the impact of the four proposed methodologies on annual emissions reporting. We believe that additional time is needed to allow stakeholders evaluate the proposals and make an informed recommendation to the City.

To that end, COBTH recommends that the City defer promulgating regulations governing the reporting of emissions from district energy systems, and should instead refer the issue to the proposed District Energy Working Group. Giving the working group until December 31, 2024 to present a recommendation to the City would provide adequate time to evaluate the recommendation and promulgate appropriate regulations before 2026, the first verification year under BERDO 2.0.

We look forward to continuing to engage with the Environment Department and the APCC as the regulatory process advances, and look forward to the opportunity to provide additional feedback on forthcoming regulations, guidance documents, and other items currently under development. Please do not hesitate to be in touch if there is any additional information we can provide.

Sincerely,

Patricia McMullin
Executive Director
Conference of Boston Teaching Hospitals