Linekin Bay Energy Co., L.L.C.

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Howard B. Bernstein
RPS Program Manager
Massachusetts Division of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Dear Mr. Bernstein:

Linekin Bay Energy Company (Linekin Bay) and has reviewed the Notice of Inquiry (NOI) issued by the Massachusetts Division of Energy Resources (DOER) and the Department of Environmental Protection (DEP) regarding proposed revisions of the regulations pertaining to the definition of "Low-Emission, Advanced Biomass Power Conversion Technologies." We appreciate this opportunity to comment and commend the DOER and DEP for their thorough approach to examining and addressing this important issue.

Linekin Bay appreciates the DOER's and DEP's recognition of the need to balance the following three factors (as outlined in the "Issues" section of the NOI): (1) the need for the rapid development of new renewable energy resources over the next several years; (2) the need to ensure improvements in the Commonwealth's environment and economy; and (3) the need to avoid undercutting or delaying incentives for the development of such cleaner renewable resources as wind and solar. We strongly agree with these goals, but are apprehensive that the proposed revisions will significantly undermine efforts to bring non-emitting renewable resource development to the ISO-NE and Massachusetts markets. This in turn would limit the Commonwealth's ability to realize its full potential to ensure environmental improvements. Wind, solar, and new biomass energy will be able to satisfy the Massachusetts RPS requirements, and it is crucial to rely on new renewables to fulfill the original intentions of the RPS.

Because of complex land-use patterns, siting wind energy generation in New England is a challenging and time-consuming process. Linekin Bay is in the very early stages of development of a 500 MW wind farm in Aroostook County, Maine, and are preparing to embark on a thorough and diligent permitting process. One of our primary motivations for siting a large wind farm in the New England region is the opportunity to fulfill Massachusetts' RPS requirements. Because we are looking to make a substantial, capital-intensive investment, regulatory stability is essential in order for us to pursue our project with confidence that it will be economically feasible. We believe that the proposed changes to the definition of low-emission, advanced biomass power conversion technologies could cause changes in the renewables market that could adversely affect wind power. Regulatory uncertainty and the potential for volatile REC markets would have a deleterious effect on our abilities to develop a wind farm in New England. We

anticipate that the proposed revisions will similarly deter wind development elsewhere in the region, thus undermining the goal of the RPS to promote new, renewable, non-emitting generation.

Linekin Bay supports the DOER's efforts to clarify the definition of renewables and streamline the permitting process, but we feel that the proposed revisions will damage our ability and incentive to site a large wind farm in New England, and presume that other wind developers will experience the same effect.

Sincerely,

Christian A. Herter III
President