



Department of Energy Resources

December 4, 2020

RE: 2020 APS Minimum Standard Review Comment

Thank you for the opportunity to comment on the Alternate Energy Portfolio Standard (APS). The Environmental League of Massachusetts (ELM) is committed to combating climate change and protecting our land, water, and public health.

The APS program must focus on providing incentives only for truly zero-emission renewable heating technologies and to decrease, or eliminate altogether, incentives for burning wood pellets and chips which produce emissions. These changes are needed to reduce greenhouse gas emissions, protect public health, and incentivize the installation of clean, non-polluting renewable energy systems.

The APS program's mission is to promote alternative energy supplies that are cleaner than coal, oil, or natural gas. However, wood-burning contributes greater greenhouse gas emissions than fossil fuels per unit of energy. At this point in time, the Commonwealth must focus on cutting emissions to achieve the Administration's mandate of net-zero by 2050.

The Global Warming Solutions Act (GWSA) Implementation Advisory Committee, which ELM sits on, has [recommended](#) that biomass and municipal solid waste combustion ("waste-to-energy") be removed from eligibility under all clean energy incentive programs administered by the Executive Office of Energy and Environmental Affairs, including the Renewable Portfolio Standard, Clean Peak Standard, Clean Energy Standard, and APS, by 2022. Beyond our net-zero emission target, additional emissions, particularly ones with harmful particulate pollution, can harm the most vulnerable among us, including children, the elderly, and those with pre-existing respiratory diseases.

Massachusetts should prioritize and incentivize zero emissions technology.

Thank you for your consideration.

Sincerely,

Casey Bowers

Assistant Vice President for Government Relations

Environmental League of Massachusetts