



Northeast Region

Coalition of Massachusetts Anaerobic Digestion Facilities

Supporting 20 Landfill gas-to-energy and AD biogas-to-energy plants operating in Massachusetts.

**Testimony of Thomas Yeransian, Principal
CommonWealth Resource Management Corporation (CRMC)
Representing the Coalition of Massachusetts Anaerobic Digestion Facilities**

**Presented virtually on Zoom before the Massachusetts Department of Energy
Resources (the DOER)**

**Public hearing on proposed amendments to 225 CMR 14.00 Renewable Energy Portfolio
Standard - Class I and 225 CMR 15.00 Renewable Energy Portfolio Standard - Class II**

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Category D: Other

Thank you for this opportunity to address the Department of Energy Resources.

I am Tom Yeransian, Principal, and a co-founder of CRMC. I represent the Coalition of Massachusetts Anaerobic Digestion Facilities¹ whose members own and operate 8 landfill gas-to-energy facilities and 12 AD biogas-to-energy facilities in Massachusetts. These 20 projects comprise the extent of anaerobic digestion facilities operating in Massachusetts. The projects generate 30 MW of low-cost, continuous, reliable renewable electricity. The Coalition was formed as a direct response to previous DOER changes to RPS Class 1 Regulations². The changes put at risk the economic viability of all 20 Massachusetts Projects.

The DOER can revitalize this important renewable energy and environmental infrastructure and we ask the DOER to provide relief for these Projects within this regulatory process to further amend the RPS Class 1 regulations. Without these 20 Massachusetts projects, the consequences include less low-cost renewable electricity, less reliability, less renewable energy diversity, less environmental protection, more greenhouse gas emissions, more fossil fuel electricity, higher costs to municipalities, and export of food waste to distant landfills.

¹ Coalition of Massachusetts Anaerobic Digestion Facilities is administered by National Waste & Recycling Association.

² 225 CMR 14.00 The Renewable Energy Portfolio Standard - Class I

Last year, Commissioner Woodcock of the DOER testified to the Joint Legislative Committee on Telecommunication Utilities and Environment (TUE) that the objective of the DOER changes to RPS Class 1 regulations was to encourage development of low-cost renewable energy in Massachusetts. These 20 Massachusetts projects are low-cost renewables that exist. Therefore to achieve its stated goal, the DOER needs to make a further regulatory change to protect the economic viability of these 20 important projects.

With amendments being made to the RPS Class 1 regulations, we encourage the DOER to make a simple, easy change to these regulations. Specifically, we ask that the DOER add a provision that states

Electric renewable generating sources that qualify as RPS Class I by converting biogas and/or landfill gas using AD biogas-to-energy or landfill gas-to-energy technologies (herein "Anaerobic Digestion Technology") and that are located in Massachusetts shall receive two (2) RPS Class I Renewable Generation Attributes for each MWh of RPS Class I Renewable Energy Generation.

To assure the economic viability of these 20 Massachusetts projects under most of the plausible future scenarios, this change would need to be implemented by January 2023. This narrow and targeted change represents less than 1-percent of the Massachusetts RECs supply and would not impact any other part of the RPS Class I regulations.

We would be pleased to provide more information to the DOER.
Thank you.

Best regards,



Thomas Yeransian
Principal of CRMC

Representative of Coalition of Massachusetts Anaerobic Digestion Facilities