



SJP | environmental consulting, llc

PO Box 303, Montague, MA 01351 | 413-559-7257 | SJP@crocker.com | SJPconsulting.biz

Department of Energy Resources (DOER)
100 Cambridge Street, Suite 1020
Boston, MA 02114

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RPS Public Comment, submitted by email to doer.rps@mass.gov

Dear Commissioner Woodcock,

As a home energy consultant, a town energy committee member, and a climate advocate with Climate Action Now of Western Massachusetts, I view the DOER's newly proposed changes to the Renewable Portfolio Standard (RPS) as inadequate for meeting the urgency of this moment in the climate crisis.

The United Nations Intergovernmental Panel on Climate Change recently expressed *the need to act at a sprint* to avoid the most dire consequences of the climate emergency, yet the RPS changes that DOER proposes backtrack on our greenhouse gas (GHG) emission reduction mandates set in 2021's Roadmap law. Even if the biomass plants are in other neighboring states, incentivizing them is not in keeping with MA's GHG reduction commitment that has global relevance and consequences.

It is beyond my comprehension how DOER can justify including biomass electric generation plants in the RPS incentivizes--incentives that ratepayers contribute to **in order to support clean, renewable energy development** and the resulting jobs in our state!

It is well established that biomass electric generation is:

- Inefficient
- Emitting of more GHGs than coal per unit of energy
- Results in forests, that should be maintained as carbon sinks and for their other ecological services, being cut as a feed stock for these facilities, and
- Highly polluting to the air quality of neighborhoods in which they operate, enough that DOER had previously proposed disallowing biomass plants in environmental justice (EJ) communities in MA, communities already overburdened with the health consequences of poor air quality from polluting facilities and roadways disproportionately sited nearby.

There is no justification for the loophole in the RPS that would result in ratepayers footing the bill to make biomass plants viable in NH, Maine and other states in the name of clean, renewable energy. Nor is it appropriate to retract DOER's commitment to keeping biomass plants out of EJ communities, plants that would further degrade unhealthy air quality in these communities.

Instead, we must invest and support, with the utmost urgency, energy generated from non-GHG-emitting sources, including wind and solar power, to attain our emission reduction targets and prevent the worst consequences of the climate crisis.

Thank you for considering these recommendations.

Sincerely,
Sally Pick