



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON, MA 02133-1054

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Committees:
Housing
Bonding, Capital Expenditures and State Assets
Export Development
Municipalities and Regional Government

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The Department of Energy Resources
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March 31, 2022, via email

To the Department of Energy Resources:

The following testimony is in opposition to the amendments which reduce or completely eliminate the core requirements of the 2012 RPS rules restricting biomass eligibility.

A major effect of the proposed changes will be to *send millions of our ratepayer dollars out of state every year* to Maine, New Hampshire, and other New England states to subsidize carbon dioxide, which will worsen health outcomes from biomass pollution and increase environmental harm.

Biomass power plants produce more harmful particulate matter pollution than coal plants, per unit of electricity generated release more greenhouse gas emissions today than can ever be recovered before 2050, result in the loss of CO2 sequestration from destruction of our forests, and deplete our soils and ecosystems.

The current Massachusetts biomass regulations properly restrict incentives for biomass in agreement with the scientific findings related to biomass. Massachusetts has only 1.9MW of biomass power that qualifies as RPS Class 1. The ability of a new biomass plant in Massachusetts to qualify for the RPS is unlikely given the fact DOER is maintaining the 60% efficiency standard for new biomass power plants and has added EJ siting restrictions, which it is proposing to limit only to new biomass plants. Environmental Justice restrictions alone eliminate the possibility of a new biomass plant qualifying for the RPS in much of the state. The proposed new rules would allow dozens of existing polluting biomass power plants across New England to qualify for Massachusetts ratepayer subsidies through the RPS.

From a jobs and health standpoint we have much better options in-state via solar, onshore and offshore wind, energy storage, building efficiency and electrification. These in-state jobs are what we should be developing. The Climate Roadmap Law provides \$12 million per year to MassCEC to “provide workforce training, educational and professional development, job placement, startup opportunities and grants promoting participation in the commonwealth’s energy efficiency, clean energy, and clean heating and cooling industries.” Moreover, the House has engrossed additional incentives to develop the offshore wind industry locally.

From the standpoint of the Climate Roadmap Law, the out-of-state biomass plants selling Renewable Energy Certificates (RECs) would allow Massachusetts to claim a higher amount of renewable energy against our emissions reductions mandates, whereas in reality the claim would result from subsidizing CO2 emitting plants beyond our borders. From a health standpoint we would be subsidizing an industry worse than coal in particulate pollution affecting the health of residents in other states that don't have our EJ protections.

In conclusion, these proposed changes will have adverse effects on asthma, diabetes, and cardiac conditions, will lead to a significant increase in carbon emissions, are against the ratepayers' desire for clean energy, would accelerate the effects of climate change, and would lead to deforestation and a decline in biodiversity. I respectfully urge DOER to scrap these proposed amendments and maintain the 2012 RPS rules.

Yours in service,

A handwritten signature in blue ink that reads "Mike Connolly". The signature is written in a cursive, flowing style.

Mike Connolly