

This comment refers to the following referenced sections of the proposed DOER regulations for renewable thermal energy regulations. Both documents require that boilers/furnaces using woody biomass be automatically fed. That regulation pretty much restricts home heating units using solid biomass to wood pellets and eliminates the use of unprocessed cordwood. That appears to be an unnecessary and counterproductive regulation. I fail to comprehend how that regulation would contribute to the objective of increased use of renewable, sustainable energy.

In the western area of Massachusetts many homeowners and small businesses have direct access to unprocessed cordwood either from their own woodlot or from a local supplier. The use of local cordwood is more efficient and has a smaller carbon footprint than a processed product such as pellets, which, while considerably better than coal, oil, or natural gas, still result in increased consumption of fossil fuels in transportation and processing.

I strongly agree with the desire to reduce the long term buildup of greenhouse gasses and to decrease dependence on fossil fuels through the sustainable use of the abundant supply of woody biomass in Massachusetts. Also, I believe a significant side benefit is the development of a market for low grade timber, which will help decrease the cost of maintaining family owned forests and thus help to maintain the carbon sequestration capacity of those forests. Please don't limit those benefits through an unnecessary regulation that only results in increased cost for some consumers and reduced incentive to maintain undeveloped forestland.

By way of full disclosure, I own and maintain 10 acres of Christmas trees and 155 acres of forestland, but do not sell any cordwood. However, I heat my home and hot water with cordwood from my woodlot and would like to upgrade to a more efficient boiler, such as a gasification system.

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Referenced sections:

ALTERNATIVE ENERGY PORTFOLIO STANDARD GUIDELINE ON BIOMASS, BIOGAS, AND BIOFUELS FOR APS RENEWABLE THERMAL GENERATION UNITS June 8, 2016

Table 2

Feedstock Conveyance

The system must be **automatically fed** from feedstock storage to the furnace or boiler

225 CMR 16.00: ALTERNATIVE ENERGY PORTFOLIO STANDARD (APS) (Draft)

Section 6. a.

v. Woody Biomass. A woody biomass unit must use **automatically fed** boilers or furnaces, and must utilize either Eligible Biomass Woody Fuel, or pyrolysis oil or biogas derived from Eligible Biomass Woody Fuel. Woody biomass units must meet the provisions regarding efficiency, system performance, use of thermal energy storage, particulate matter and carbon monoxide emissions, fuel supply sustainability, fuel quality, and greenhouse gas emissions in 225 CMR 16.05(4)d.iii. and the Department's *APS Guideline on Biomass, Biofuels and Biogas*, as well as receive all applicable permits from the MassDEP.