

# Northern Tree Service LLC.

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Massachusetts Dept. of Energy Resources  
100 Cambridge St #1020,  
Boston, MA 02114

Re: 225 CMR 16.00 Straw Proposal

August 10, 2021

Northern Tree Service LLC.  
1290 Park Street,  
Palmer MA. 01069

On behalf of the Northern Tree Service thank you for the opportunity to share some thoughts regarding possible adjustments to the Alternative Portfolio Standard. As you can well imagine, we are most familiar with 225 CMR 16.00 as it applies to biomass and its potential to create a value-added market for our company's waste material. Accordingly, we are pleased to see the DOER making bold changes, the assembly of which has the potential to reinvigorate this valuable program.

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We wish to offer the following as feedback to the 225 CMR 16.00 Straw Proposal:

## **ACP and Obligation change**

We support both adjusting the alternative compliance payment (to \$40) and adding a onetime 2% to the annual minimum standard. Understandably, the DOER has weighed the impacts of this change on ratepayer and found the environmental benefits of establishing a meaningful AEC price structure to be worth the added burden.

## **Reductions in (fossil) CHP eligibility**

We support the adoption of the proposed CHP eligibility changes and have confidence that the DOER will only apply these adjustments to fossil-fueled (non-renewable) CHP facilities. We recognize that this technology is statutorily allowed, and feel that the benefits of combining heat and power should be recognized. However, the benefit to the Commonwealth now seems grossly out of balance with the technology's AEC production. We hope this change will redirect attribute-related funds to more deserving technologies including modern wood heating.

## **Metering thresholds**

We wish to commend the DOER on its success in both designing and officiating the APS. Clearly, this success has been greatly hampered by those who misunderstand the performance of modern wood heating and the sustainability safeguards established by the DOER. Notably, this program has demonstrated that energy metering can be successfully and defensibly achieved by quantifying fuel use. While this approach has been applied to the smallest systems its conservative accounting (for parasitic load and grid efficiency) may be applied to larger systems. Naturally, the DOER has the responsibility to ensure that the largest systems are the most carefully assessed; a proportional increase in oversight. However, the obligation of direct (heat)

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has added significantly to the cost and complexity of many systems. Therefore, we propose increasing the benchmark between fuel-metered and heat-metered wood fired thermal RTGUs be aligned with the MassDEP eligibility point of 3MMBtu's. For administrative simplicity and continuity we also propose that ALL fuel metered systems be required to account for parasitic load (removing the special provision for the very smallest systems).

## **Carbon reduction timeframe**

We commend the DOER's commitment to accelerating the Commonwealth's decarbonization and the subsequent positive impacts on climate change. As such, we support the alignment of APS with the RPS to demonstrate a 50% reduction in GHG emissions within 20 years. Climate change is upon us and we must do more to address this daunting challenge.

## **Forest-derived requirement**

We recognize the importance of sustainable forest management and the need for an outlet for the resulting thinnings. However, the Commonwealth produces more than enough non-forest-derived clean wood waste to supply the APS. Obliging the members of the Biomass Suppliers List to source 30% of their feedstock from the forest-derived origins is an unnecessary burden, one that has created significant messaging challenges for the wood industry. Unfortunately this obligation has obscured that fact that the Commonwealth annually produces 1-3 million tons of non-forest derived wood chips, a clean waste that is increasingly difficult to dispose of. As an example, the city of Springfield spends \$150,000 to dispose of its urban wood waste per year.

Further lost in the messaging that requires a 30% forest-derived fraction is the understanding that non-forest derived clean wood waste is the result of unavoidable hazard mitigation/vegetation management efforts (trees threatening powerlines, train tracks, playgrounds etc.). Because this chipped material (it must be chipped) was unavoidably created its subsequent GHG release was also unavoidable. It is also worth recognizing that as this material bioremediates (rots) it also releases exactly the same heat as if it were thermally reduced (burned)....Both are oxidative reactions with identical outcomes. Timeframe is the only difference.

Finally, it is worth recognizing that the Manomet Study commissioned by the DOER in 2010 explicitly excluded chipped material (which dominates the Commonwealth's wood stream) from their exhaustive analysis. Moving away from forest-derived materials amplifies and accelerates the GHG reductions associated with the APS' modern wood heating systems.

We therefore support the elimination of the requirement that eligible woody biomass fuel be composed of +30% forest derived material.

## **New eligible woody biomass fuel category**

To more accurately characterize and better quantify the GHG benefits of eligible woody biomass fuel within the APS we propose that the DOER in 225 CMR 16.05k add a new category (IV) which must be (at a minimum) 95% Forest Derived Residues, Non-forest Derived Residues, and

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Forest Salvage. As such this fuel would be eligible to displace Natural gas, electric resistance, propane, fuel oil #6 & #2.

## **Biofuel change**

We support the capping of AEC production from liquid biofuels at 460,000/yr. and the expectation of a minimum blend of B20.

## **APS vs MassSave choice**

Being a significant producer of eligible, clean, non-forest derived wood waste we are staunch advocates for the modern wood heating devices that are best able to responsibly utilize our chips. As such we recognize that only the best technologies should be eligible to earn AECs. However, this expectation has limited consumer choice to the Eligible Furnace & Boiler list, a portfolio of technologies capable of remarkable GHG impacts but at a cost. Accordingly, we were very disappointed when the MassCEC ended its renewable thermal rebate program and MassSave (despite being required to) declined to extend their program to modern wood heating. We are further disappointed to see the DOER proposing that future RTGUs choose between the APS and MassSave. While we had wished to see a refunding of a program similar to that offered by the MassCEC this policy change will at least put all technologies on an equal footing.

Thank you for this opportunity to provide feedback on this Straw Proposal. We are confident that with some subtle adjustments the APS can continue to facilitate renewable heating initiatives across the Commonwealth.

Sincerely,

*Timothy LaMotte*

Timothy LaMotte, President  
Northern Tree Service LLC.