Commissioner Judith Judson

Massachusetts Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

Dear Commissioner Judson:

I write to express my strong opposition to new incentives for biomass power generation through the proposed Clean Energy Peak Standard (CPS). DOER’s straw proposal indicates that the Department is proposing to focus its CPS procurements on sources such as “most energy storage facilities, small non-solar renewable facilities such as AD or biomass, etc.” The purpose of the law is to support cost-effective reductions in greenhouse gas emissions during peak periods of energy use. In reality, however, biomass power plants are expensive, generate more net CO2 pollution than fossil-fueled power plants per MWH of energy produced, and emit disproportionately large amounts of air pollution. These are exactly the types of carbon-intensive and expensive electricity sources that the CPS is intended to replace and should thus be categorically excluded from eligibility.  Biomass power plants should not be considered eligible sources under the CPS at all, much less prioritized for procurements.

May I refer you to: [https://www.dogwoodalliance.org/wp-content/uploads/2017/03/The-Great-American-Stand-Report.pdf](https://urldefense.proofpoint.com/v2/url?u=https-3A__www.dogwoodalliance.org_wp-2Dcontent_uploads_2017_03_The-2DGreat-2DAmerican-2DStand-2DReport.pdf&d=DwMDaQ&c=lDF7oMaPKXpkYvev9V-fVahWL0QWnGCCAfCDz1Bns_w&r=r37IG82PzLRFp3xkbauh8Nvd-mimmMUb4pCufvNLFmk&m=m6i0DO9IN8yXcLLAL5uj2nX8doVxcfH5udv62vMUhEI&s=hk5yT67RHxXm4OZ1flwDhuudMzgDzkogtB664GjM0wA&e=)

Sincerely,

Laurel Facey