April 11, 2019

Commissioner Judith Judson  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
   
Dear Commissioner Judson:  
   
I write to express the strong opposition of RESTORE: The North Woods to new incentives for biomass power generation through the proposed Clean Energy Peak Standard (CPS). RESTORE is a Massachusetts-based nonprofit organization with hundreds of members and supporters across the state.

DOER’s straw proposal indicates that the Department is seeking 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.

We urge you to withdraw the proposal to add incentives for this climate-disrupting and polluting energy source to the CPS.  
   
Sincerely,  
Michael Kellett

Executive Director  
RESTORE: The North Woods  
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