

12 April 2019

Commissioner Judith Judson

Massachusetts Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

Dear Commissioner Judson:

UU Mass Action is writing to express our 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. However; in reality, 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.

This is a time for responsible transition to non CO2 producing energy sources. We call on the DOER to consider the well-being of our communities and prepare us for our clean energy future. Biomass power plants produce CO2 intensive energy, which is the direct opposite of what we need.

Biomass power plants should not be considered eligible sources under the CPS at all, much less prioritized for procurements.

Sincerely,

Laura Wagner, Executive Director

Unitarian Universalist Mass Action

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