Dear Commissioner Judson:

I strongly oppose the new incentives for biomass power generation in the proposed Clean Energy Peak Standard (CPS).  The law is meant to support cost-effective reductions in greenhouse gas emissions during peak periods of energy use.  But 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.

Sincerely,

Susan Donaldson MD

Cambridge, MA