



Commissioner Judith Judson  
Massachusetts Department of Energy Resources  
100 Cambridge Street, Suite 1020  
Boston, MA 02114

April 12<sup>th</sup>, 2019

Dear Commissioner Judson:

Since its founding during the campaign to pass the landmark Clean Water Act in 1972, Clean Water Action has worked to win strong health and environmental protections by bringing issue expertise, solution-oriented thinking and people power to the table. Clean Water Action organizes strong grassroots groups and coalitions, and campaigns to elect environmental candidates and to solve environmental and community problems. With over 46,500 in-state members, Clean Water Action has played an integral role in closing fossil fuel power plants, banning toxic chemicals, and cleaning up our water resources in the Commonwealth.

We write today 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. In reality, however, biomass power plants are expensive, generate more net carbon 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.

Focusing on policies that do not require new infrastructure should be the standard for the CPS, and there are ample opportunities for responsive demand management and deeper energy efficiency that have not been explored by the department. Given the lack of movement on integrating new grid-edge technology into markets by federal regulators, it is the state's responsibility to create avenues for participation for storage, efficiency and demand response resources.

We thank you for the work on this policy and hope to collaborate further to help frontline and environmental justice communities.

Sincerely,  
Elizabeth Saunders,  
Massachusetts Director