Commissioner Judith Judson

Massachusetts Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

([doer.cps@mass.gov](mailto:doer.cps@mass.gov))

RE: Against new incentives for biomass power generation

Dear Commissioner Judson:

As a long-time resident of western Massachusetts, I am writing to express my strong opposition to new incentives for biomass power generation through the proposed Clean Energy Peak Standard (CPS) and request that more and thorough research be done before going any further. I understand that the Baker Administration is now promoting increased subsidies and incentives for biomass energy on all fronts – the Alternative Portfolio Standard, the Renewable Portfolio Standard, and the proposed Clean Peak Standard. As you know, MA Department of Energy Resources (DOER) recently awarded $2.8 million in APS infrastructure grants for wood-chipping facilities in western MA, to support increased residential and commercial wood heating. Now DOER is proposing to prioritize biomass burning in its new “Clean Peak Standard”. And just last week DOER announced proposed revisions to the RPS regulations that significantly weaken the GHG emissions standards for biomass power plants and expand what can be burned.

In my opinion, Western Massachusetts already has enough air pollution.

It is my understanding that biomass power plants are expensive and 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.

In closing, I strongly suggest that government funds be directed toward cleaner sources of energy rather than biomass power plants.

I also propose that the trees in our state-owned forests not be cut down to fuel any biomass power plants. After all, healthy trees help to keep our air clean = a benefit to everyone!

Sincerely,

Lucille Gionfriddo

Feeding Hills, MA