Dear Commissioner Judson:

We are 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. 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.  Clean energy standards must only include solar, wind,  geothermal, energy conservation and energy efficiency models. Any energy source that includes cutting down of trees should not be included in this. We need our forests to sequester carbon dioxide in the efforts to stop climate change. We need to find ways to reduce energy needs and to fill our needs with renewable energy technologies that are currently available, and to invest in new energy saving technologies.  Biomass is not the answer.

Sincerely, Mike and Miriam Kurland 566 East St., Williamsburg, MA, 01096  [mimbck@yahoo.com](mailto:mimbck@yahoo.com) 413-269-7529