

I am sending these comments as follow-up to this week's hearing at Greenfield Community College, at which I spoke.

These regulations are prematurely submitted for approval. Before substantial analysis can be done and proper opportunities for public comment take place, the regulations must outline in detail the eligibility requirements for Clean Peak Resources. Guidelines will not suffice, since these are non-enforceable. We need clear parameters for "Clean" before incentives are committed.

Even if it were acceptable to pass these regulations with specific requirements to be defined in the future via regulation (which it is not), passing regulations that state that guidelines will be forthcoming is not legislatively proper and in no way acceptable. The notion that guidelines can be subsequently publicized individually is unduly challenging for monitor of notices and issuance of comments by the public.

As long as the RPS is connected to these regulations and as long as the aforementioned include incineration-based power sources, such as biomass and trash, it is completely misleading to call these energy sources "clean." It has been well documented that emissions from these and all combustion technologies are as dirty as it gets. The proposed 225 CMR 21 must SPECIFICALLY EXCLUDE these dirty power sources IN PERPETUITY.

I respectfully request that the public comment period be extended to 60-90 days AFTER guidelines for sources are publicized and basic requirement parameters are incorporated into the regulations.

Thank you for your consideration,
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