



October 30, 2019

Kara Sergeant
MA Department of Energy Resources
100 Cambridge St. Suite 1020
Boston, MA 02114
Submitted via email to: DOER.CPS@mass.gov

Re: Proposed Clean Peak Energy Portfolio Standard (225 CMR 21.00)

Dear Ms. Sergeant:

The Partnership for Policy Integrity has the following serious concerns about the proposed Clean Peak Energy Portfolio Standard (CPS) regulation, 225 CMR 21.00, and requests an extension of the public comment period.

1. Proposed Regulation is Incomplete

The proposed regulation cites five guidelines, including a *Guideline on Clean Peak Resource Eligibility*, that have not been made available for the public to review. Without the opportunity to review these proposed guidelines, it is impossible to analyze the potential impacts of this regulation, particularly to assess whether it will reduce greenhouse gas emissions as intended and meet the requirements of the Global Warming Solutions Act.

DOER must release the draft guidelines for public review and extend the public comment period by at least 30 days after they have been posted.

2. Proposed Regulation Incentivizes Polluting Technologies

The proposed CPS regulation provides incentives for qualified RPS resources indiscriminate of their emissions profile. At this time, there are draft amendments to the current RPS regulations pending that would significantly weaken the eligibility standards for biomass power plants. If DOER's proposed rule changes to the RPS are adopted, highly polluting biomass plants previously ineligible for renewable energy subsidies in MA would be eligible for rate-payer incentives through both the RPS and the CPS.

Massachusetts has long recognized that biomass energy is not "clean." The 2010 Manomet study, which DOER commissioned to assess the carbon impacts of forest biomass energy, found that net emissions from wood-burning power plants exceed carbon emissions from fossil fuel-

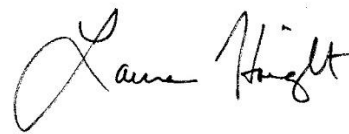
fired power plants for decades to more than a century.¹ Only after those timeframes does biomass begin to show a carbon “benefit” relative to fossil fuels. Wood-burning power plants also emit large quantities of fine particulates (PM 2.5), nitrogen oxides, and other smog precursors, all air pollutants that are harmful to human health. Massachusetts residents are already exposed to high levels of particulate pollution, particularly from residential wood burning,² and Massachusetts has some of the worst asthma hotspots in the nation.³

It is reasonable for ratepayers and the public to expect that any new power generation subsidized through the Clean Peak Standard would increase deployment of truly clean technologies that reduce air pollution during peak demand periods, particularly since peak demand often coincides with peak air pollution from energy consumption (in summer, for cooling; in winter, when wood-burning is already a significant source of PM). Incentivizing technologies that would increase the pollutant load during peak periods of energy use when pollution levels are already at their highest will only serve to worsen air quality and harm public health.

The CPS regulations must be amended to exclude biomass power plants, garbage incinerators, and other combustion-based technologies from eligibility.

Massachusetts has an opportunity to show true climate leadership as it develops this new, first-in-the-nation Clean Peak Standard. Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Haight". The signature is fluid and cursive, with the first name "Laura" written in a larger, more prominent script than the last name "Haight".

Laura Haight
U.S. Policy Director

¹ Walker, T., P. Cardellicchio, J. S. Gunn, D. S. Saah and J. M. Hagan (2013). "Carbon Accounting for Woody Biomass from Massachusetts (USA) Managed Forests: A Framework for Determining the Temporal Impacts of Wood Biomass Energy on Atmospheric Greenhouse Gas Levels." *Journal of Sustainable Forestry* 32(1-2): 130-158. See Table 7 "Years for Biomass Energy Emissions to Reach Equal Flux with Fossil Fuel Energy Emissions."

² <http://www.pfpi.net/massachusetts-tops-northeast-in-air-pollution-from-wood-burning>

³ Asthma and Allergy Foundation, *Asthma Capitals 2018: The Most Challenging Places to Live With Asthma* (2018) includes three MA cities in its list of top 20 Asthma Capitals based on estimated asthma prevalence, emergency department visits due to asthma, and asthma-related fatalities: Springfield (#1); Boston (#11) and Worcester (tied for #12).