

Sirs:

Though I was unable to attend the only nearby hearing today, I have read through the proposed Clean Peak Standard regulations posted on the DOER Web site.

It is not apparent that there is any guarantee made that the power-generators being granted Clean Peak status need really be 'clean' energy resources, i.e., those who produce power by burning garbage or biomass would be eligible to be blessed as 'Clean Peak Resources' because they meet the Renewable Portfolio Standard. This, in itself, is a misnomer: biomass and garbage should not be considered as 'renewable' or 'clean'. The proposed regulations must be tightened to ensure that only really clean energy sources are designated as meeting the Clean Peak Standard. To do otherwise is to muddle the definition of 'clean energy' to the point where it is meaningless.

The proposed regulations refer to several guidelines that are not yet published: this makes the whole process suspect. Unpublished guidelines are nebulous, at best. Were you thinking you could put one over on an unsuspecting public? (Don't give them too much information, it will just confuse them). We are not amused, or confused.

Because of these deficiencies, publishing the guidelines and then extending the comment period so that the public can weigh in on the subject seems to be the only proper action you can take. Publish the guidelines and give us sixty days (minimum) to digest them and comment.

Thank you for your attention to this matter.

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