

To Massachusetts Department of Energy Resources,

Thanks for the opportunity to comment on the Clean Peak Energy Standard.

“Clean” energy is generally, logically taken to mean non-fossil, or non-carbon based, an energy source that will not contribute to growing climate chaos because of carbon emissions.

This is a crucial part of the definition of clean energy, and it eliminates biomass (and all combustive energy sources), even though wood burning, like wood rotting, being part of the planet’s carbon cycle, can be described in a long-term, theoretical context, as carbon neutral.

The key, overriding factors are: A) Biomass IS carbon based, and B) we don’t have centuries to play with, but need to reduce carbon emissions immediately. Any processes to satisfy peak energy production CAN NOT exacerbate the global climate crisis. Please keep the existential priority of atmospheric carbon reduction firmly in first place when it comes to energy production!

The draft regulations make reference to unpublished guidelines by DOER, including a key one on what resources (materials or processes) might be eligible for clean peak power production. This and all other guidelines need to be made available for public comment, and I would hope for – and expect – an extension of the comment period to accommodate it.

Thank you -

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