

# Perspectives for Decarbonizing the Peak Focus Area Working Group from the *MA 2050 Roadmap* and other relevant research & analysis

Michael Walsh, 6/17/25



**Groundwork Data** is a public-interest advisory, research, and technology firm supporting a clean, equitable, and reliable energy transition.



State & Local  
Integrated  
Decarbonization  
Planning

Gas Pipeline  
Economics &  
Policy

Urban  
Infrastructure



Future of  
Heat

Gas Transition  
Planning

Smart Use of  
Sustainable Fuels

<https://www.groundworkdata.org/research>

# Today's Goals

1

Review  
**"Net-Zero"** &  
alternative fuels



Alternative fuels  
play a specific  
situational role in  
decarbonization.

2

Review  
**2050 Roadmap:**  
alt. fuels & DTP



MA economy-  
wide situational  
context

3

Case studies:  
**H<sub>2</sub> & RNG**



Some alternative  
fuels could work,  
others won't

4

**Consider policy  
implications**



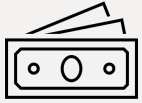
Start with local  
pilots that address  
multiple local  
problems and  
opportunities

*Think locally and find applications that support decarbonization and other goals*

# Net Zero & Alternative Fuels

Alternative fuels play a specific  
situational role in decarbonization.

# Net-Zero Objectives



Low  
Cost



Convenient for  
Customers



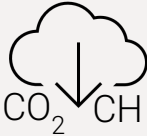
Healthy



Enriching  
Employment



Equitable



Emissions<sup>4</sup>  
Eliminating



Reliable



Resilient



Safe

# Principles of Net Zero Energy-System Planning

## ***Fuel Saving***



Renewable  
Electricity



Energy and Material  
Efficiency



Widespread  
Electrification

**Clean, local, emissions-free energy resources, with novel customer value propositions.**

## ***Systems-Building***



Increased  
Integration

**Share energy and resources across space and time.**

## ***Situational Fuel Use & CO<sub>2</sub> Management***



Alternative Fuels for  
Hard-to-Electrify  
Sectors



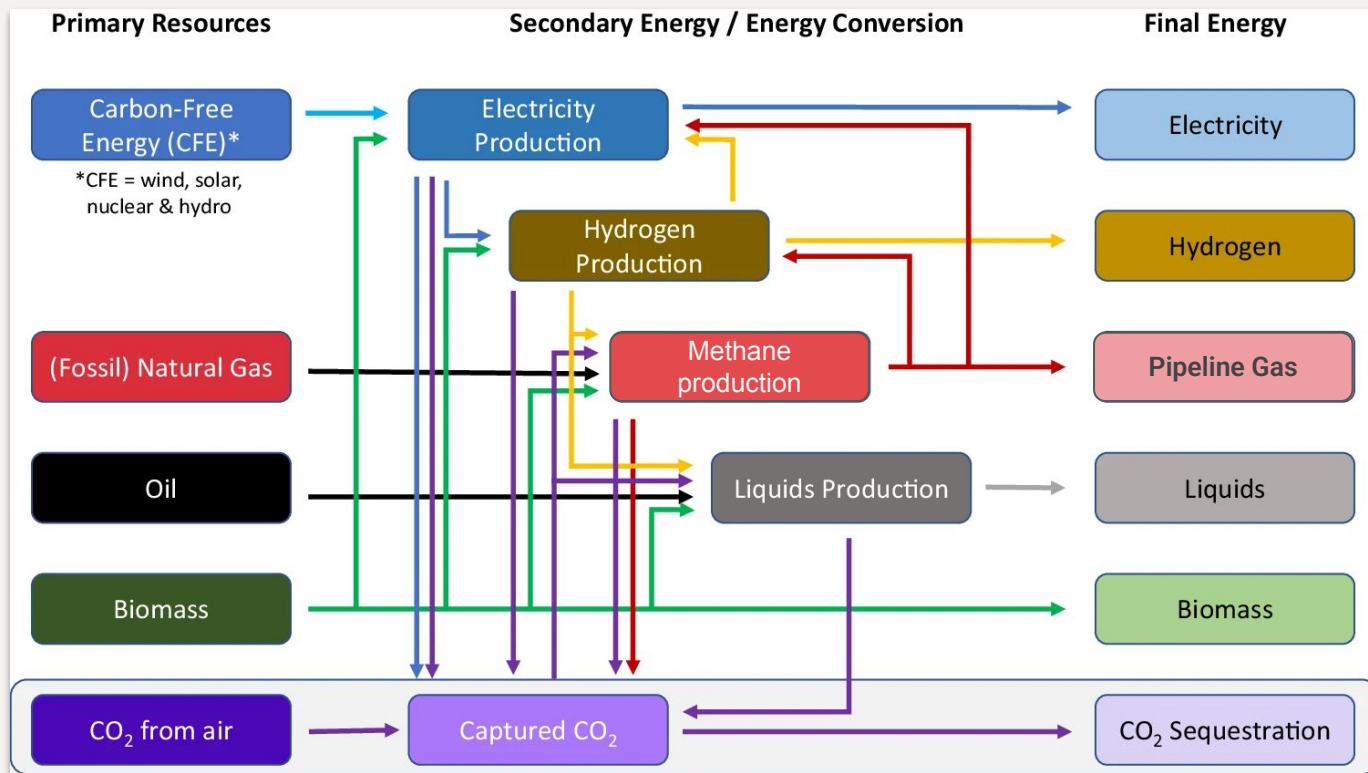
Limited use of  
Fossil fuels



Carbon Dioxide  
Removal

**Fills in the gaps while reducing and reversing the net flow of GHGs in to the atmosphere.**

# Fuels & CO<sub>2</sub> management



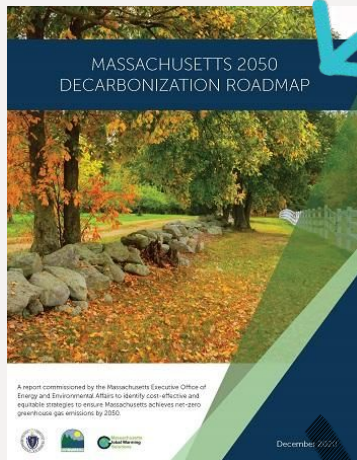
Some pathways are more favorable than others:  
The efficacy of alternative fuel strategies to meet final energy demands will be dependent on the situational context of energy needs and available resources

# Massachusetts 2050 Decarbonization Roadmap

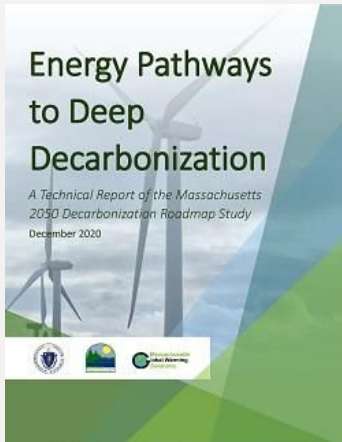
MA economy-wide situational context



# 2050 Roadmap & Decarbonizing the Peak



Summary of core strategies need to achieve Net Zero



Economy-wide analysis of decarbonization pathways

What is the impact of “decarbonizing the peak” by?

1. Eliminating thermal (gas & oil) peakers largely through greater solar + storage: **No Thermal** pathway
2. Going all the way to “zero emissions” with 100% renewable fuels: **100% Renewable** pathway
3. Relying on **Pipeline Gas** in the heating sector over electrification

# MA 2050 Roadmap Pathways for DTP

Energy markets are optimized on cost while emissions are constrained

Pathway	Research Question	Defining Assumptions	Key Finding
All Options	Under the most likely assumptions, what is the least-cost deployment of energy system technologies that achieves deep decarbonization?	This is the "benchmark compliant" decarbonization pathway, using midpoint assumptions across most technical parameters.	Deep electrification and broad renewable buildout create a reliable energy system that is only marginally more expensive than today.
Pipeline Gas	What are the impacts of continued reliance on natural gas in buildings? What role can a decarbonized gas product play in a Net Zero MA?	Building electrification is mostly limited to conversion from oil in the near term, with slower rates of gas-to-heat pump conversion in the long term.	Requires a substantial increase in imported low-carbon fuels, possibly above technically feasible quantities. Most of this fuel goes to high-value sectors to compensate for continued emissions from buildings using a fossil/clean fuel blend. Costs increase significantly.
100% Renewable Primary Energy	What does a 100% Renewable Energy Strategy across electricity and all fuels require in terms of resources, storage, and costs?	No fossil fuels allowed; zero-carbon combustion fuels allowed for electricity generation by thermal power plants.	Reliance on zero-carbon fuels needed for grid balancing and end uses leads to dramatically higher costs in 2050; demand may exceed feasible supply. Would likely require technological breakthroughs, yet to be identified, to meet resource constraints and contain costs.
No Thermal	What resources will be needed if thermal generation is not available to provide reliability services?	All thermal capacity retired by 2050.	Substantially higher reliance on solar power, particularly ground-mounted, and new, long-duration utility-scale energy storage to provide grid balancing, leading to dramatically higher costs.

Central benchmark pathway in this analysis. Supplanted by CECP "Phased Electrification" as benchmark scenario for MA.

Finding remains uncontested. Corroborated by EPRI 2024 Study (page 50). 20-80 LDC Pathways Study did not attempt to refute the finding that residual gas use is best "netted" or offsetted rather than using RNG.

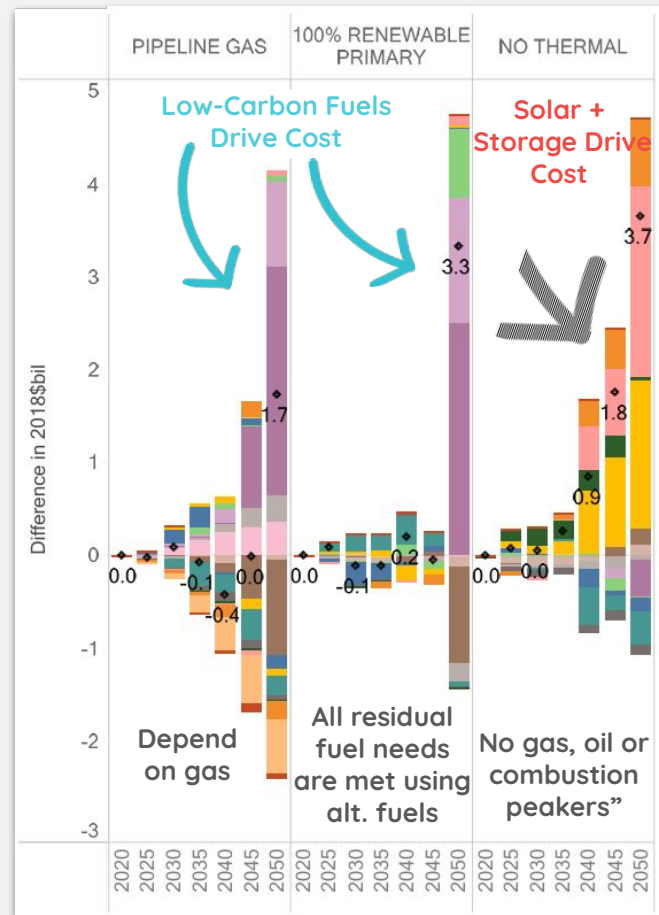
Large cost of "going all the way to **zero gross emissions**" without netting removals due to large reliance on renewable fuels.

Finding consistent with contemporary study by [EFI/E3/Caltran Net Zero NE Study](#)

# Alternative fuels and no peakers raise transition costs

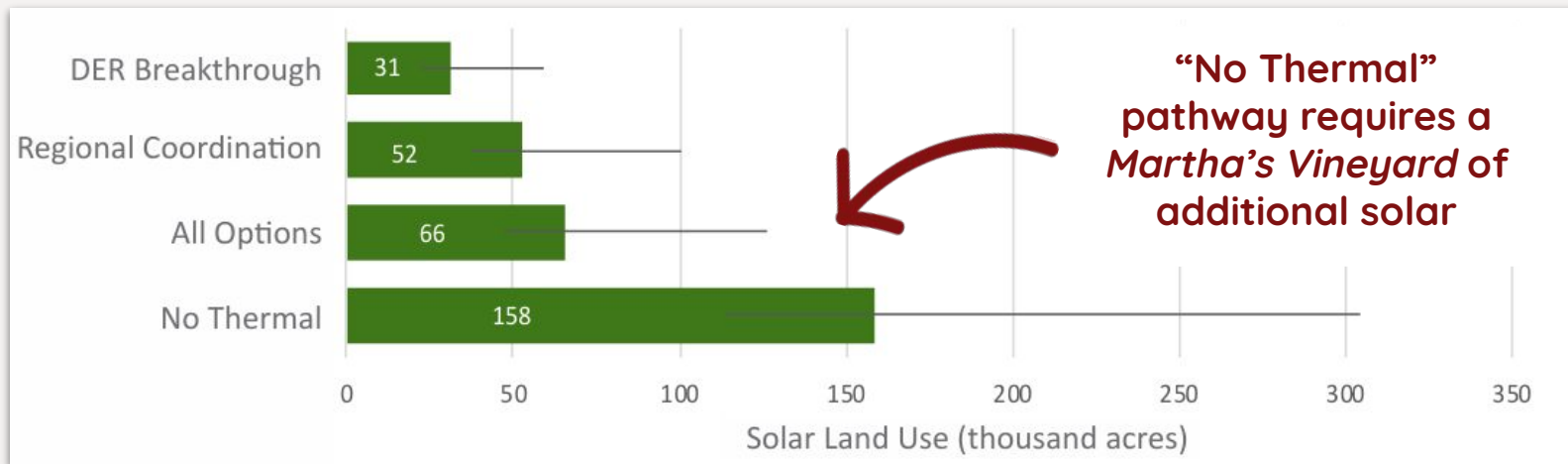
1. **No Thermal** increased costs due to higher need for underutilized solar + storage.
2. Going all the way in **100% Renewable** requires expensive low carbon fuels
3. Relying on **Pipeline Gas** in heating requires expensive low carbon fuels which are prioritized for transportation sector.

## Costs relative to Benchmark Scenario



Dots indicate net cost of scenario relative to benchmark

# “Peaker” Elimination Requires Overbuilding of Solar



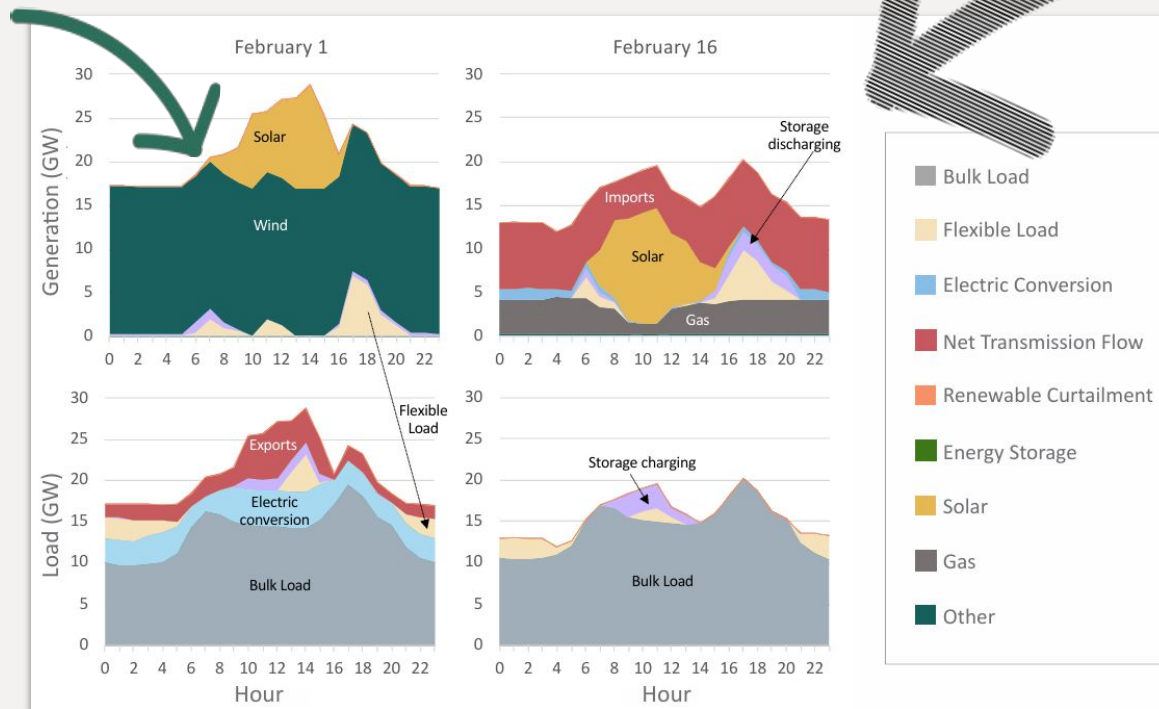
# Challenge of Decarbonizing the Peak

## Windy Day

Peak is decarbonized by lots of wind and solar.

No gas peakers needed.

MA becomes an energy exporter!



## Cold and Still Day:

Imports and gas peakers are needed to meet demand.

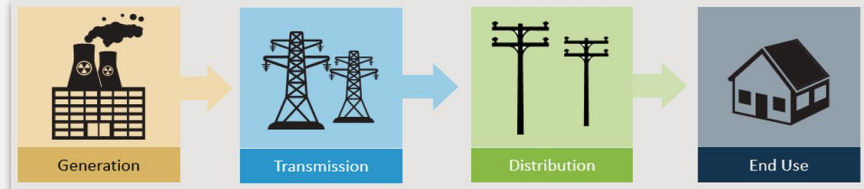
Storage and flexible loads play a small but important role.

More solar+storage build-out leads to underutilization and higher costs.

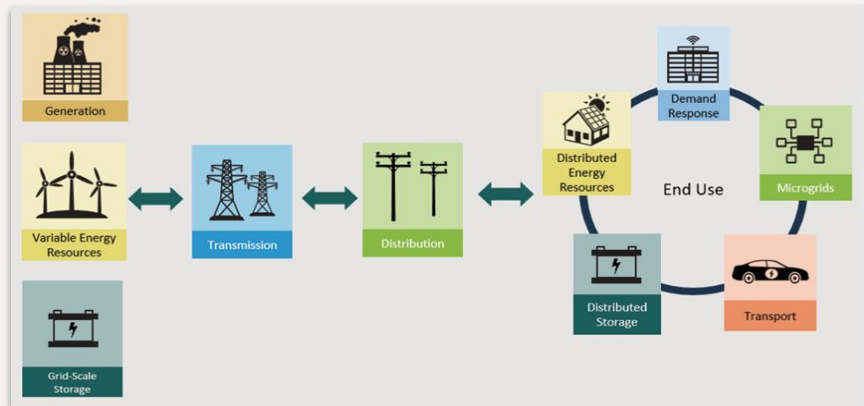
# MA 2050 Roadmap's Perspective on Peaking

“As the quantity of renewables on the system grows, Massachusetts’ use of, and reliance on, gas-fired generation will decline precipitously; these units could continue to be both useful and valuable but serve in a new role as a long-duration reliability resource. In such a role, the use of gas-fired generation in 2050 would be minimal and fully consistent with achieving Net Zero emissions statewide. Electricity-sector emissions with infrequent gas generation used only for system balance would closely approach, but not reach, zero by 2050. Blending hydrogen produced from excess renewables during periods of high production and low demand could further reduce those residual electricity sector emissions, as could deploying zero-carbon fuels or employing carbon capture.” (MA 2050 Roadmap, pages 63 & 65)

## Today

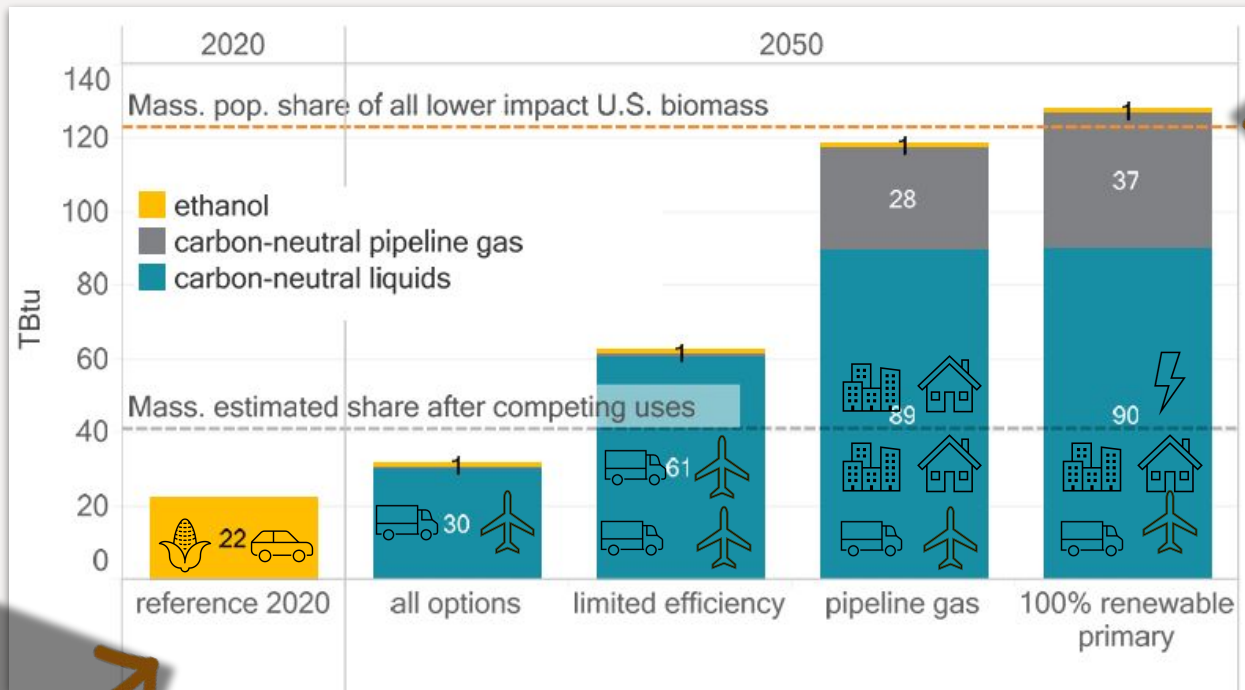


## Future Net Zero Grid





# Over-Reliance on Alternative Fuels is Challenged by Limited Feedstocks



High alt. fuel  
reliance  
pushes  
against  
feedstock  
availability.

This is in your  
gas tank today  
and it's probably  
more emissions-  
intensive than  
gasoline!

# MA 2050 Roadmap: Major Take-A-Ways

1

**You're gonna have to burn something somewhere**

Thermal resources  
“firm up”  
highly-renewable,  
highly-electrified  
systems.

New tech  
breakthrough is  
possible, but not  
certain enough.

2

**Net-Zero means that fossil fuels can be used, albeit sparingly**

2050 Limits still  
allow 10% of 1990  
levels across  
energy sectors.

3

**The application of “low-carbon fuels” should be situationally specific**

Focus on “edge cases” that solve multiple problems: reliability, DERs, waste management

4

**Over reliance on “low-carbon fuels” can induce second order impacts. MA can't assume these resources are infinitely available.**

Second order impacts include as land use change, food prices, etc.



# Case Studies in Renewable Fuels

Some alt. fuels could work, others don't

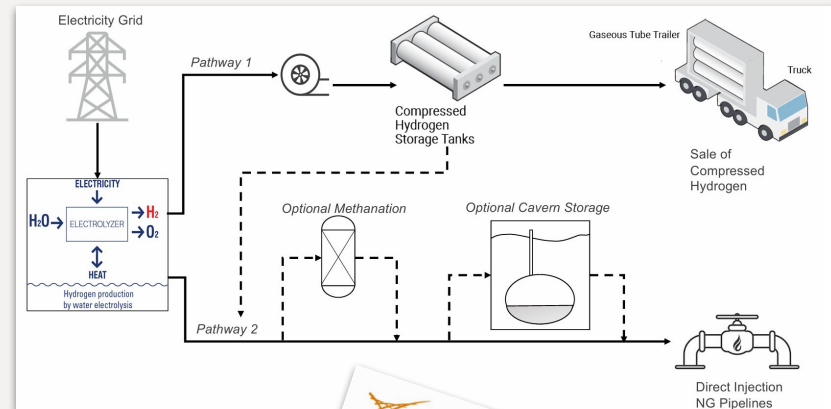
# Case Study: H<sub>2</sub> in MA

MassCEC-sponsored study by *PNNL* exploring H<sub>2</sub>/power-to-gas in Holyoke MA

Only 6 of 82 modeled scenarios exhibited positive ROI:

- Zero energy prices + CO<sub>2</sub> tax
- Small-scale implementation that provided specific-yet-limited locational value.

Take-a-way: Alt. fuels need favorable economics and/or a specific niche purpose.



# Case Study: RNG Production from a WWTP

## National Grid (NY) Newtown Creek WWTP RNG

Brooklyn Gas Rate Design Panel, 4/28/23 Cases 23-G-0225 and 23-G-0226, (pg. 711)		Rate Year 12-Mths Ending Mar 31, 2025
D3 Gas Produced (dth)		90,427
D5 Gas Produced (dth)		105,739
Total Gas (dth)		196,165
Estimated Weighted Average Cost of Gas	→	\$3.25
Commodity Sales		\$637,502
		2025
D3 RIN		\$2.50
D3 RIN \$/MMBtu	→	\$29.32
LCFS \$/MT of CO2 eq		\$100.00
LCFS \$/MMBtu	→	\$14.48
D3 Credit Sales (Trend Projection)		\$2,651,091
D3 Sales LCFS Credit		\$1,309,381
Northwest Natural Purchase Price	→	\$12.90
D5 Credit Sales		\$1,364,027
Total Revenue Forecast		\$5,962,002

**Subsidy:** \$27.14/mmbtu      **Value of gas:** \$3.25/mmbtu

Today's RNG Projects are only viable because of lucrative Renewable Fuel Standard (RFS) California Low-Carbon Fuel Standard (LCFS) subsidies aimed at generating low-carbon transportation fuels.

In 2023 the EPA conducted rule making to create an “electric” RFS pathway that skipped upgrading of biogas to instead generate electricity via combustion or fuel cell.

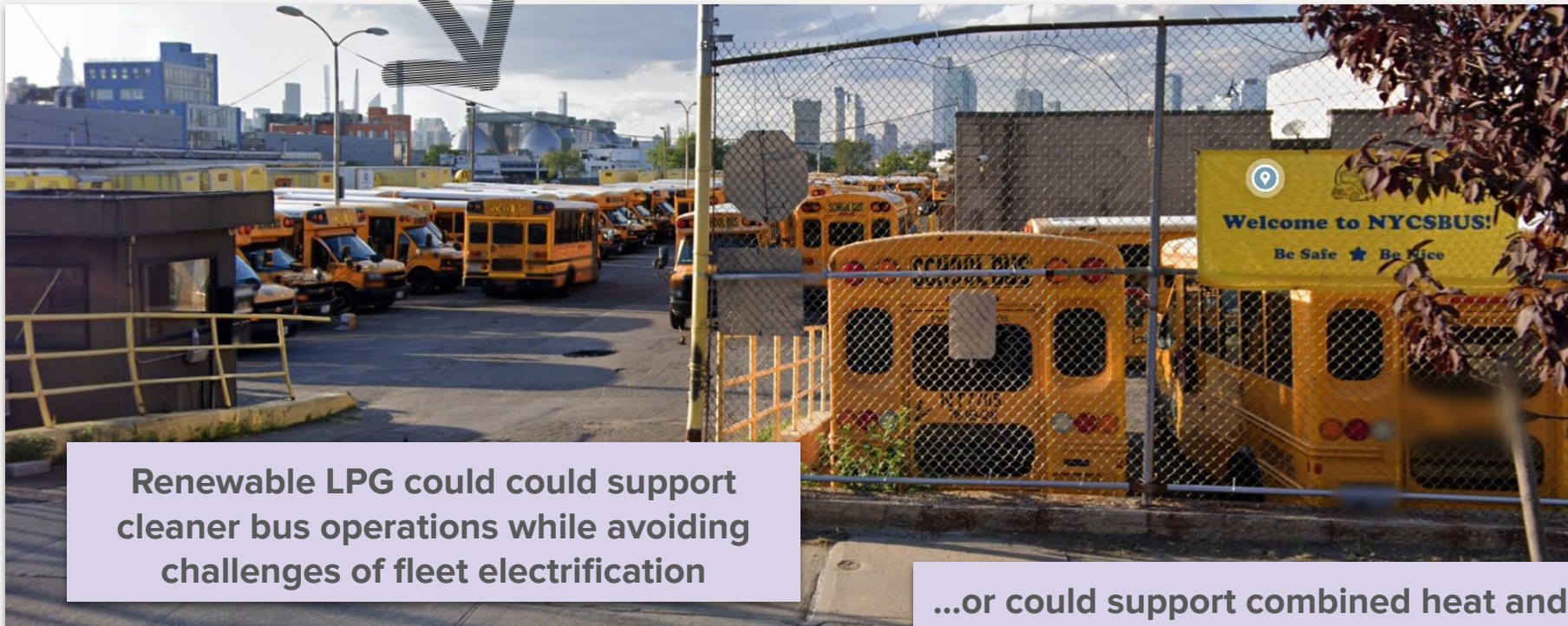
WM “announced it will keep two sites [electric] — rather than converting them to RNG sites as planned — due to the proposed RFS changes.”

Proposed rules were never adopted.

[EPA releases final Renewable Fuel Standard rule without proposed credit market for EV fueling | Waste Dive](#)

# Creative Thinking in Renewable Fuels

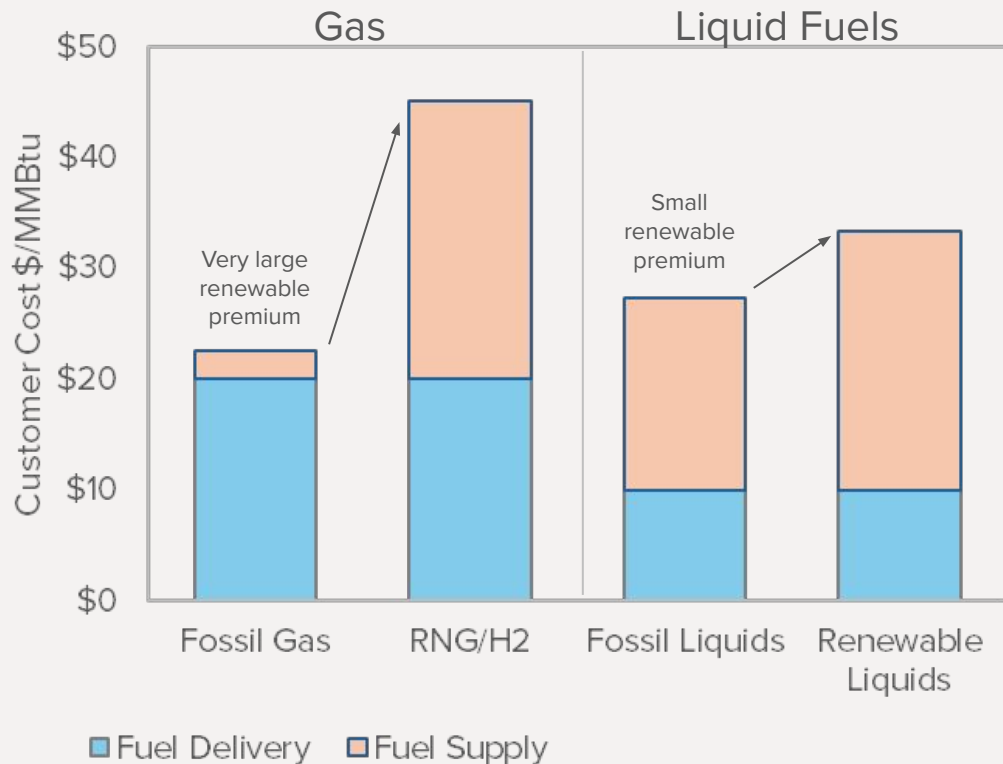
Optimizing use across sectors



Renewable LPG could support cleaner bus operations while avoiding challenges of fleet electrification

...or could support combined heat and power district system.

# Renewable Fuels: Economics



Groundwork Data illustrative analysis

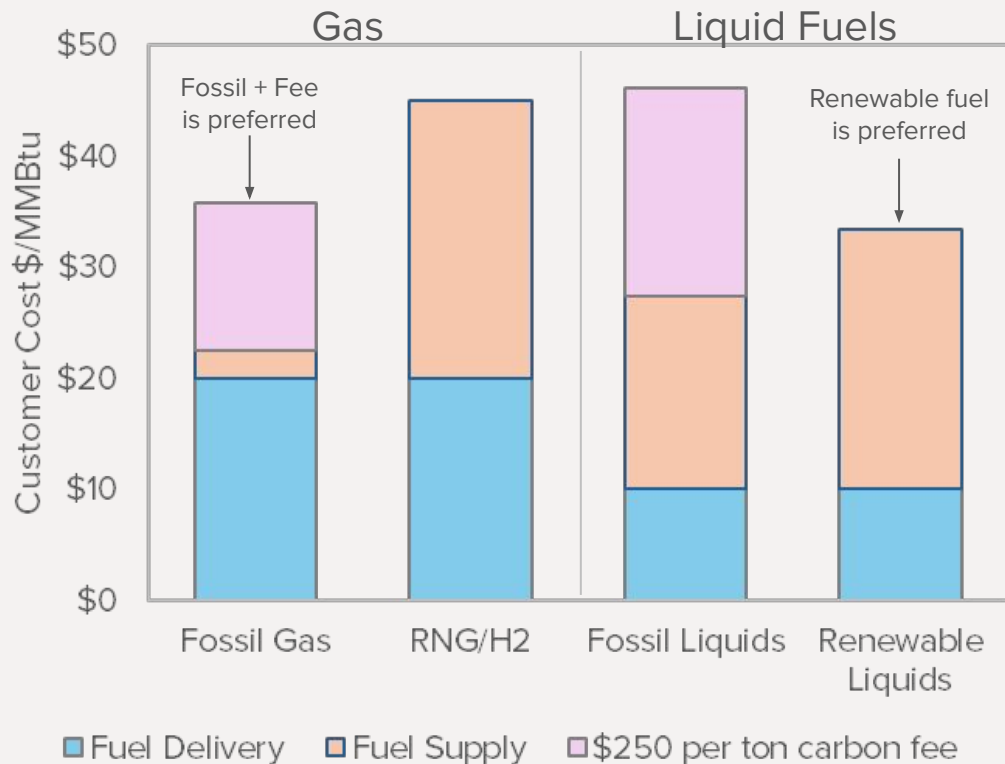
High cost of RNG would be a significant burden on customers without value creation: *an incentive to electrify*

A **consumer** would prefer to pay a carbon tax or compliance fee than buy the purchase

A **producer** would rather generate the market-competitive liquid renewable fuel over RNG

*Today RNG projects proceed because of lucrative federal and California subsidies >\$30 per MMBTU for transportation fuels*

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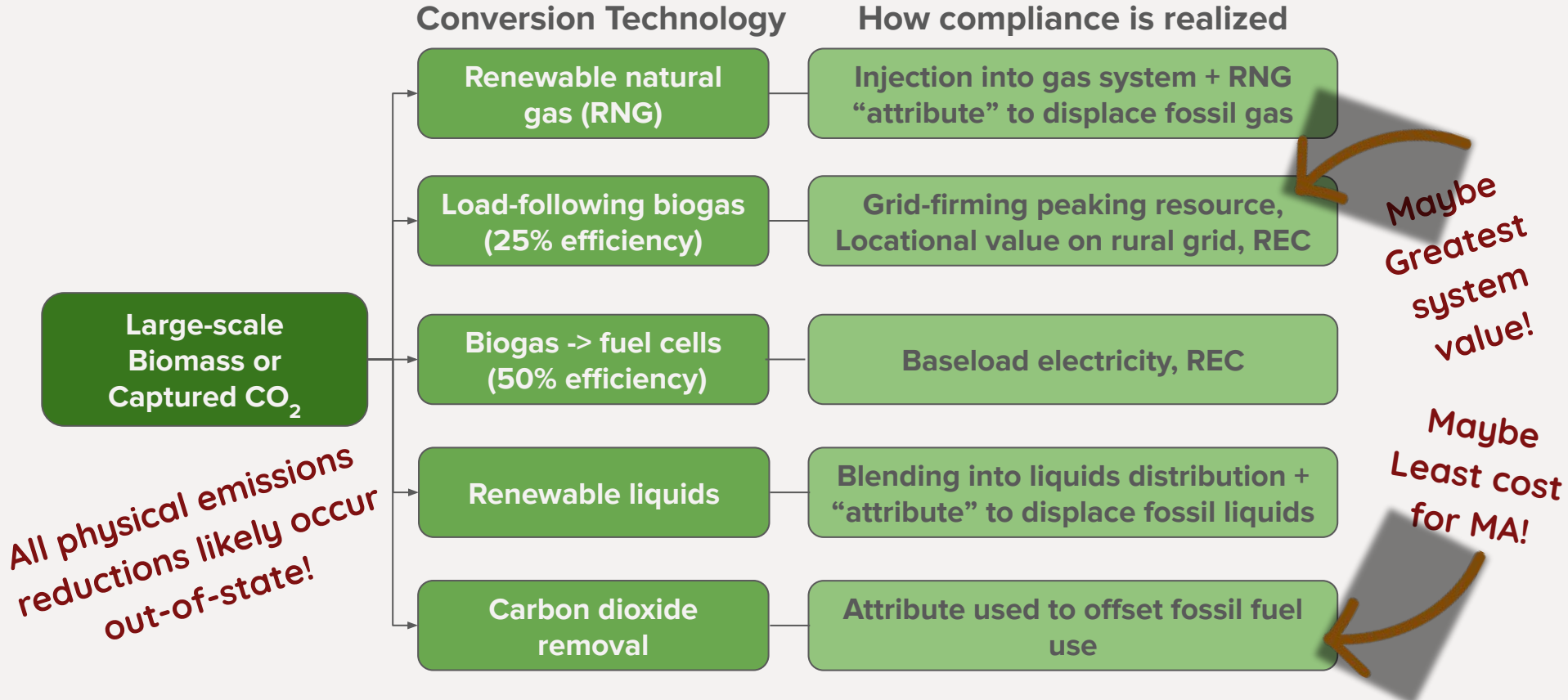
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# Policy Considerations & Conclusions

Start with local pilots that address multiple local problems and opportunities

# Thinking Through Out-of-State Resources

## An Attribute Mishmash





# Thinking Through Local Resources

Local sustainable bioenergy resources: at most ~3% of current state fuel consumption

## Distributed Alternative Fuel Resources

Load-following biogas facilities at dairy farms, waste water, and large food waste sites.

Lack economies of scale but create local value.

## Regional Alternative Fuel Resource

Regional organics collection to feed into a biorefinery for high value liquid fuels serving marginal fuel needs (incl. peaking).

Achieves economies of scale, but lacks local value



*Deer Island: Low carbon systems integration at its finest*

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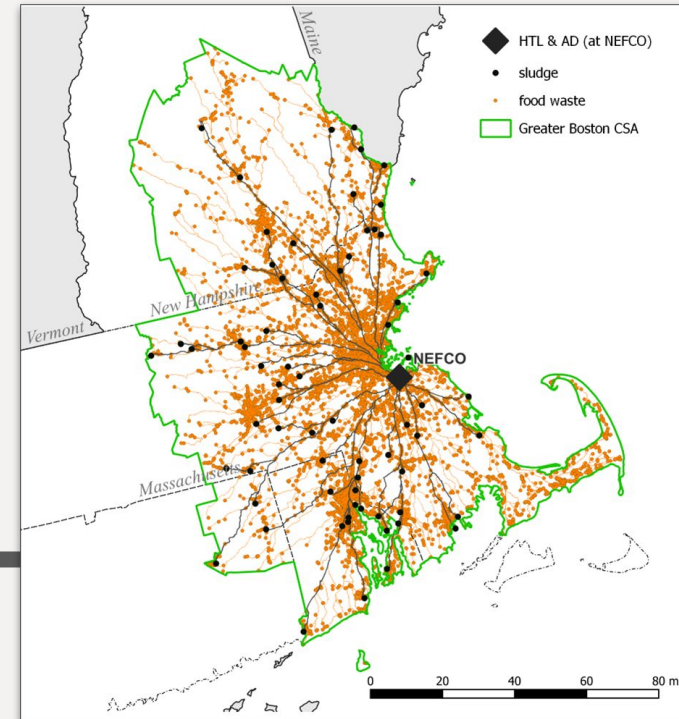
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Groundwork Data and Pacific Northwest National Laboratory, Publication Pending

# Alternative Fuels & Decarbonizing the Peak

Concluding thoughts: Innovate in tech. rather than GHG accounting

1

## **Out-of-state resources**

may be available for decarbonizing the peak, but ultimately require complex and sprawling accounting frameworks.

2

**Instate resources** are small but may provide local and regional value depending on the context. Situational context matters more than average cost, GHG, and an expansive list of broader indicators.

3

Create a policy environment that **values synergistic opportunities** for local and regional valorization of waste resources. Seek out and pilot demonstration projects.

**Thank you!**

**Questions?**

# Waste-to-X Indicators



## Economic

1. Net present value
2. Return on investment
3. Feedstock capacity, by type
4. Total cost reduction
5. Unit profit (feedstock)
6. Total travel cost
7. Maximum gate fee
8. Profit-sharing gate fee (Cost reduction)
9. Profit-sharing gate fee (NPV equalized)
10. Break-even gate fee
11. Levelized cost of energy

## Environmental

12. Total residuals
13. Total air/water discharge
14. Total avoided disposal
15. Total avoided effluent
16. Energy conversion efficiency
17. Supply chain net GHG
18. Supply chain air pollutants
19. Supply chain water use
20. Fossil energy use
21. Carbon intensity
22. Nuisance potential
23. Cumulative env. impacts

## Social

24. Total energy produced
25. Energy service (size/type)
26. Energy service flexibility
27. Energy interconnection requirements
28. Waste transport intensity
29. Jobs
30. Employment carbon footprint
31. Net-zero emissions rating
32. Highest waste use (Zero waste hierarchy)
33. Locational context
34. EJ impacts analysis
35. Cumulative health impacts
36. Transparent lifecycle process
37. Public involvement plan
38. Risk and mitigation plan
39. System ownership
40. Local community benefit
41. Neighborhood perception
42. Land/View shed requirements

