

(RPS + APS rule changes)

**Comments on DOER Proposed Biomass Energy Promotion – 5/16/2019
Ellen Moyer, Ph.D., P.E., P.O. Box 556, Southampton MA 01073**

DOER proposes to undo human and environmental health protections and betray an agreement they made with their clients - Massachusetts citizens - less than a decade ago.

Citizens had poured thousands of unpaid hours into a grassroots effort to remove corporate pork for biomass plants. Enough voters – more than 70,000 - signed a petition to put a referendum question on the state ballot. That question would ask voters if they desire to subsidize biomass power plants. Knowing the answer would be “no,” state regulatory agencies instead remedied the regulations voluntarily.

Accordingly, the EOEEA Secretary in 2010 wrote to the DOER Commissioner specifying the required regulatory improvements. He wrote:

“In light of the Manomet study, we have a deeper understanding that the greenhouse gas impacts of biomass energy are far more complicated than the conventional view that electricity from power plants using biomass... is carbon neutral.... Our policy should reflect this current science.”

This state-commissioned Manomet study demonstrated that biomass plants harm the climate for decades. That's unacceptable. We must address the climate crisis immediately, according to overwhelming worldwide scientific consensus.

DOER's reckless proposal replaces science with superstition. You can't make biomass plants carbon-neutral by proclamation.

Our forests work hard for us to remove carbon dioxide, produce oxygen, provide shade, clean the air, clean water, conserve water, provide food and habitat, and provide refuge for humans. Protect them!

State government needs to rearrange its priorities. Rather than doling out taxpayer and ratepayer money to reward people for starting forest fires, wrecking our climate, drying up our rivers for cooling water, and polluting the air, the State should instead use precious citizen money for constructive activities. Such as education.

Right in this very university, a week ago today the chancellor broadcast in a campus-wide email:

“I write to you today to convey my grave concerns about the Fiscal Year 2020 budget proposal released yesterday by the Senate Ways and Means Committee.... The budget cuts... would be felt across the board by students, faculty and staff, and would impede the extraordinary progress we have made in recent years in student success, accessibility, and national rankings.”

Massachusetts is the world leader with respect to biomass energy. DOER's proposed sellout to special interests would harm not only MA but the entire world.



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

IAN A. BOWLES
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1181
<http://www.mass.gov/envir>

July 7, 2010

Philip Giudice
Commissioner
Department of Energy Resources
100 Cambridge St., 10th floor
Boston, MA 02114

Dear Commissioner Giudice,

Thank you for your work on the *Biomass Sustainability and Carbon Policy Study* by the Manomet Center for Conservation Sciences. As we move forward to implement the Global Warming Solutions Act of 2008 (GWSA), which mandates 80% reduction in greenhouse gas emissions below 1990 levels by 2050 and 10 to 25% reduction in emissions by 2020, it is essential that state funding and incentives reflect this change in the incentives we provide biomass energy under the Renewable Portfolio Standard.

In light of the Manomet study, we have a deeper understanding that the greenhouse gas impacts of biomass energy are far more complicated than the conventional view that electricity from power plants using biomass harvested from New England natural forests is carbon neutral. The findings of the Manomet study have changed the policy landscape for biomass energy production derived from wood fuels. Our policy should reflect this current science by moving to support the development and operation of facilities that have the greenhouse gas profile needed to fulfill our emission-reduction mandates. While all questions have not been answered, and we expect new science to continue to guide our policy, I am confident that we now have enough information for the Department of Energy Resources (DOER) to take the next step in changing the way in which the Commonwealth provides incentives for biomass energy.

Specifically, the Manomet study suggests that biomass combined heat and power (CHP) technologies using woody biomass from New England forests may contribute to overall greenhouse gas reductions due to higher levels of efficiency. The study does not provide in-depth analysis of carbon accounting for residual forest products, by-products, energy crops, or clean wood waste (e.g., from mills), though the study suggests that use of such biomass fuels would



reduce greenhouse gas emissions over the relevant timescale of the GWSA when used with high efficiency conversion in thermal or combined heat and power applications.

Given the general findings of the Manomet study, our obligations under the GWSA, and the authority of DOER to regulate state incentives for renewable biomass sources of energy, including responsibility for setting criteria qualifying low emissions and advanced power conversion technology, I direct you and your staff at DOER to move expeditiously to align our regulations with our better understanding of the greenhouse gas implications of biomass energy. You are to propose draft regulations pursuant to Section 11F of Chapter 25A of the General Laws amending the current Renewable Portfolio Standard Class I regulations with the components outlined below, on or before September 1, 2010. Given the uncertainty created by the Manomet study in the renewable energy markets as well as the exigency associated with achieving steep greenhouse gas emissions reductions, you should plan to have proposed final regulations available by October 31, 2010, and have final regulations in place by no later than December 31, 2010. As is the case with all regulatory changes, I look forward to a fully transparent and robust public process as the new regulations are developed and finalized.

Changes in policy to be reflected in regulation should include but not be limited to the following:

- 1) In order to qualify for renewable energy certificates as a low emission biomass renewable energy facility using advanced power conversion technology, generating sources must be designed, constructed and operated to achieve maximum practicable efficiency as determined by DOER. This efficiency standard shall provide significant near term greenhouse gas dividends in a combined heat and power facility or comparable technology that will achieve specified minimum efficiency and emissions performance standards. The results of the Manomet study highlight the need to make the most efficient use of biomass fuel, maximizing the energy produced while minimizing greenhouse gas emissions.

DOER will seek to ensure that the maximum practicable efficiency standard reflects the goals of the Green Communities Act, which among other efficiency goals seeks to promote the use of combined heat and power having a minimum efficiency of 60% with a goal of increasing to 80% by 2020 with the understanding that the efficiency of this technology is constantly improving.

I understand that biomass eligibility for the RPS is just one of the issues raised by the public and medical community, including significant health concerns. These important issues are beyond the scope of the Manomet study and this rulemaking. However, qualifying renewable energy generating sources using biomass must also comply with the federal Clean Air Act emission standards for particulate matter and other pollutants.

From: Chancellor Kumble R. Subbaswamy <chancellor@umass.edu>

Sent: Thursday, May 9, 2019 1:25 PM

To:

Subject: Important news about our budget

I write to you today to convey my grave concerns about the Fiscal Year

UMassAmherst

Chancellor
Kumble R. Subbaswamy

May 8, 2019

Dear Campus Community,

I write to you today to convey my grave concerns about the Fiscal Year 2020 budget proposal released yesterday by the Senate Ways and Means Committee. The proposed Senate budget, which includes an unprecedented statutory tuition freeze with no associated funding to cover the university's fixed costs, would produce an \$8.2 million shortfall for our campus.

The budget cuts required to make up for this shortfall would be felt across the board by students, faculty and staff, and would impede the extraordinary progress we have made in recent years in student success, accessibility, and national rankings. If the Senate budget is enacted, the campus would be required to make deep cuts, including personnel reductions, to financial aid, student services, faculty hiring, research and extension support, IT support, deferred maintenance, and administrative overhead.

These cuts would come at a time when we have made exhaustive efforts to keep costs down for our students, while continuing to enhance the quality of the education we provide. UMass Amherst produces a budget plan each year that utilizes mandated financial targets and efficiency improvements to fund critical strategic priorities to enhance the student experience. During the past three fiscal years these measures have provided over \$18M for enhanced instructional quality; access and

affordability for our lowest income students; and investment in an aging campus infrastructure of buildings, IT and utilities. The campus has completed efficiency and effectiveness projects that have resulted in over \$10M in cost savings in FY18 and an additional \$20.5M in total cost savings expected through FY21. The savings include \$2.5M annual internal reallocation of instructional resources to areas of greatest student and employer demand. This carefully planned allocation of resources has fueled dramatic improvements in graduation rates (76% graduating in just four years, up from 63% in 2012) and diversity (entering class 32% minority, up from 21% in 2012).

It is bewildering, given our proven track-record as responsible stewards of the resources entrusted to us and the remarkable results we have achieved for our students, that the Senate would propose to enact such measures. The budget put forth by the Senate would have a negative effect on the very academic and institutional qualities needed to ensure student access and success at UMass and would severely hinder our ability to produce the talented graduates who go on to fuel the Commonwealth's innovation economy.

I want to assure you that we will continue to work through this process and will do everything in our power to ensure that these cuts do not become a reality.

Sincerely,

Chancellor Kumble R. Subbaswamy

University of Massachusetts Amherst

