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June 6, 2019

Massachusetts Department of Energy Resources
Attn: John Wassam
100 Cambridge Street, Suite 1020
Boston, MA 02114

--- submitted electronically via doer.rps@mass.gov ---

Re: RPS Class I and RPS Class II Regulations

Dear Mr. Wassam:

On behalf of Climate Action Now of Western Mass, I am offering comments on the DOER's proposed changes to RPS regulations. Our comments focus on two types of proposed changes: those that pertain to the burning of biomass and trash to generate electricity, and those that pertain to changes to the SREC-1 program.

BURNING BIOMASS and TRASH

As is known since the recent release of the latest Intergovernmental Panel on Climate Change (IPCC) Report, it is crucial to reduce our greenhouse gas (GHG) emissions by about half before 2030 if we are to avoid the worst impacts of climate breakdown.

Taking this imperative seriously, we would expect DOER to increase its restrictions on burning biomass (for Class I RECs) and trash (for Class II RECs) to generate electricity and redouble its insistence on using only the latest and best technology whenever such burning is allowed to receive credit as fulfilling the RPS requirement. It is therefore impossible to understand the rationale for DOER's currently proposed changes to the RPS regulations that would weaken, rather than strengthen, these requirements, and therefore would lead to increased GHG emissions as well as the release of small particulate pollutants that worsen asthma, cardiovascular and other diseases.

Of considerable concern is the removal of efficiency requirements for generation units using over 95% fuel from forest salvage and non-forest derived biomass residues (especially in light of the change in definitions for these categories that

are not consistent with climate science). If efficiency standards are to be changed, they should be strengthened rather than eliminated, to assure that any burning of biomass for electricity be held to the highest and best standards possible.

The removal of the provisions for biomass fuel certification, and verification of eligible biomass woody fuel, weakens the standards by which generators will be monitored and thus would fail to assure the preservation of our forests. The elimination of the panel to monitor and track verification and enforcement, and the elimination of required efficiency monitoring are contrary to public benefit for the same reasons. Safeguards such as oversight panels, tracking and monitoring are crucial to any credible process for assuring that the burning of biomass is not interfering with our efforts to reduce GHG emissions.

The elimination of whole sections of the RPS biomass regulations pertaining to forest impact assessment and annual compliance reporting, and the substantial weakening of the lifecycle GHG analysis demonstrates yet another failure to protect the public from runaway climate disruption. The health of our forests is crucial to our ability to sequester carbon as a complement to decreasing our release of GHGs, as the recent IPCC report makes clear.

Finally, the proposed increase in the amount of trash that could be burned to generate electricity to qualify for RPS program's Class II REC incentive is without merit, as is the proposed increase in remuneration. There is no justification for the resulting increase in environmental pollution that our residents would be exposed to.

The SOLAR REC PROGRAM

The announced changes to the SREC-1 program such that SRECS would no longer be available to consumers after the first 40 quarters violates the original intent of the program and its announced benefits to the early adopters of solar technology. Changing the rules midstream in this way would significantly undermine consumer confidence in solar businesses and diminish the trustworthiness of our regulatory agencies. Both these effects would inevitably reduce consumer demand for solar and thus derail our efforts to reduce our GHG emissions by replacing fossil fuel burning with clean, renewable forms of energy.

Conclusion

When Massachusetts residents lobbied our legislators to support an increase in the RPS in the last legislative session, it was with the understanding that such an increase would be fulfilled with clean, renewable energy such as from solar and

wind. Yet the proposed RPS changes would lead to an increase in burning biomass and trash, which are by no means clean forms of energy, and the carbon emissions from which are not properly accounted for or controlled in the program. Furthermore, the lower standards proposed would allow less technologically advanced forms of generation to be eligible for RECs, resulting in increased GHG emissions and particulate pollution. Allowing the proposed regulatory changes to move forward would betray the legislative and popular intent of the RPS increase and impede our ability to dramatically decrease our GHG emissions before 2030.

For these reasons, we urge the DOER to withdraw from consideration the proposed changes to the RPS regulations.

Adele Franks for
Climate Action Now, Western Mass