

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:

The following are my comments regarding the proposed changes to Massachusetts Renewable Portfolio (RPS) Class I and RPS Class II Regulations.

BURNING BIOMASS and TRASH

Since we need to be reducing carbon and methane emissions as quickly as possible, I strongly oppose decreasing restrictions on burning biomass for Class I RECs and trash for Class II RECS. In fact, I would support increasing restrictions and monitoring. Restrictions are needed both for protecting air quality and reducing carbon emissions but also for preserving forests. 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. In particular, any changes that would increase the likelihood of a large biomass fueled plant being build in East Springfield where air quality and asthma are such huge concerns seems like a slap in the face to a recognized Environmental Justice Community.

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 increase in remuneration. There is no justification given for the resulting increase in environmental pollution that our residents would be exposed to.

Conclusion

When I lobbied the legislature in support of 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 could be expected to lead to an increase in burning biomass and trash, which are by no means clean forms of energy for the people who live near the plants, 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 GFG emissions before 2030.

Please withdraw from consideration the proposed changes to the RPS regulations.

Sharon M Moulton, mother and grandmother of other Massachusetts residents
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