



*The Commonwealth of Massachusetts*

**MASSACHUSETTS SENATE**

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*Chairman*  
SENATE COMMITTEE ON  
GLOBAL WARMING AND CLIMATE CHANGE

JOINT COMMITTEES:  
ECONOMIC DEVELOPMENT AND  
EMERGING TECHNOLOGIES  
EXPORT DEVELOPMENT  
TELECOMMUNICATIONS, UTILITIES AND ENERGY

SENATE COMMITTEE ON  
PERSONNEL AND ADMINISTRATION

June 7, 2018

Commissioner Judith Judson  
Department of Energy Resources  
100 Cambridge St., Suite 1020  
Boston, MA 02114

Dear Commissioner Judson

I write to you today regarding proposed changes to 225 CMR 14.00 and 225 CMR 15.00, regulations concerning Class I and Class II renewables under the Renewable Energy Portfolio Standard. It is my understanding that these proposed changes to the regulations would allow for expansions of the use of biomass and waste to energy. While I understand that technologies have made significant progress over the years, I have grave concerns over the expansion of biomass and waste to energy.

When the Massachusetts Legislature voted last session to elevate the annual increase in the Renewable Energy Portfolio Standard from 1% to 2%, we envisioned a major influx of solar, hydro, and wind energies. What we did not expect to meet these heightened requirements was a backfill of biomass and waste to energy.

I am opposed to any change in regulation that could possibly endanger our compliance with the requirements of the Global Warming Solutions Act or threaten our public health through increased carbon emissions. While biomass technology has made great strides over the years, increased use will lead to a reduction in forests, which serve as a natural carbon sink. Additionally, while waste to energy is an important part of municipal waste reduction, it can by no means be called "carbon-neutral." Therefore, I fear that an expansion of waste to energy will serve to push us further away from our requirements under the Global Warming Solutions Act.

Thank you for accepting this comment letter. If you have any questions or concerns, please do not hesitate to reach out.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc R. Pacheco".

Marc R. Pacheco  
Dean of the Senate  
Massachusetts State Senate