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Good afternoon. My name is Cathy Kristofferson. I live here in north Central Mass in the Town of Ashby where I am a Conservation Commissioner. I am a member of our town's energy resources committee that implemented our solarize program. I am a member of a local organizing group who works to promote clean energy policy with Mass Power Forward. I am here to comment on the proposed draft regulations for the Renewable Portfolio Standard Class I and II because clean energy doesn't come out of a smokestack.

Including burning trees and incinerating trash in the legal definitions of renewable energy gets in the way of investments in local clean energy and better approaches to waste management.

On the MASS.GOV website for Municipal Waste Combustors it says:

"While specific pollution controls vary from plant to plant, all facilities are equipped with systems for reducing smog-causing emissions, neutralizing acid gases, trapping fly ash and other particles, and lowering concentrations of mercury and organic chemicals."

It is important to note, however, that no combination of technologies available today can completely eliminate emissions from combustion."

That doesn't sound like clean energy to me, nor an energy technology we should be subsidizing or promoting at all.

Neither does industrial-scale biomass plants inefficiently burning trees to make electricity while spewing greenhouse gas emissions into the air we breathe when we have better cleaner options like offshore wind and solar. Those technologies were the sources of clean energy that were envisioned to fill the doubled 2% annual RPS increase fought for in the last legislative session, not the trees in our forests. Trees in their intact forest ecosystems have a better role to play in the battle for a livable planet. We need carbon sequestration not carbon sent up smokestacks, and certainly not sent up smokestacks subsidized on the backs of ratepayers.

Earlier this month, I heard the forestry industry testify at a legislative hearing that emissions from biomass are less than natural gas "even." Ignoring the fossil fuels burned during harvesting, processing, and transport of biomass is exactly like ignoring the emissions produced during extraction, processing, transport, and distribution of fracked gas. We have seen this before so are wise to attempts by industry to obscure the true environmental costs of these sources of energy.

What about the emission reduction mandates of the Global Warming Solutions Act? What about the warnings of the UN IPCC and the 4th National Climate Assessment if we don't take rapid action? How do these draft changes help deal with those issues?

Wednesday I was at a press conference on another energy matter, and one of the speakers said she was embarrassed for our state. And you know, I get it:

We don't want our Commonwealth to be ignoring science,
We don't want to be gutting environmental regulations,
We don't want industry calling the shots and writing the regs,

We don't want New York, or California, or New Mexico, or any other state getting to zero before us. We may not have any control over the lunacy at the federal level but we don't want to see the same things happening here. We want our state, the Commonwealth of Massachusetts, leading the nation on energy solutions to the climate crisis we face.

These proposed changes to the RPS do nothing but take us backwards – lowering thresholds and lessening accountability. The best thing you can do is scrap these draft regulations for the RPS and come back to the people of the Commonwealth with a draft that promotes no combustion - no carbon, no methane, no greenhouse gas emissions at all - just the clean energy future we have all been fighting for.

Thank you.

As testified at the May 17, 2019 hearing in Gardner, MA.

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