



June 25, 2019

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

Re: Draft Regulations Amending 225 CMR 15--Renewable Energy Portfolio Standard – Class II

Dear Mr. Wassam:

As you may know, Community Eco Power (CEP) recently purchased the Springfield and Pittsfield Waste-to-Energy (WtE) facilities. These facilities are crucial to maintaining vital waste disposal for our communities while generating clean renewable energy and reducing GHG emissions. Our leadership team at Community Eco Power (CEP) brings deep knowledge of the Waste-to-Energy industry as well as years of proven experience in operations, finance and management to our organization.

Community Eco Power provides resources to communities to implement successful WtE solutions. By combining resources, sharing expertise, and working together, communities can accomplish much more than through individual efforts alone. We are committed to:

- Becoming an active participant in each community we serve
- Making these facilities part of Community Eco Power's success
- Introducing top management and access to growth capital
- Cross-pollinating best operating practices to increase efficiencies and performance
- Requiring honesty, integrity, professional courtesy, and fairness in everything we do
- Being immediately responsive to our customers and our community

To ensure the long-term sustainability of the facilities, we support DOER's proposed changes to 225 CMR 15--Renewable Energy Portfolio Standard – Class II. We hope that DOER will eliminate the sunset provision in a) 15.07(2) that requires the percentage requirement to revert to 3.5% in 2026; and b) 15.08(4)(a)(2) that reverts the ACP to \$11.50 per MWh beginning in 2026. Instead, DOER in consultation with MassDEP should conduct periodic reviews of the percentage and ACP requirements and if needed, make changes based on market conditions and policy objectives.

We look forward to working together to make sure that Western Massachusetts can rely on these facilities for many years to come.

Sincerely,

Richard Fish
President & CEO

Community Eco Power, LLC | PO Box 833, Black Mountain, NC 28711

☎ 410-785-5120 | ✉ info@cecopower.com | 🌐 www.cecopower.com