



Massachusetts  
Municipal  
Association

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June 7, 2019

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

Dear Mr. Wassam,

On behalf of the cities and towns of the Commonwealth, the Massachusetts Municipal Association appreciates the opportunity to submit comments on the Department of Energy Resources' (DOER) proposed changes to 225 CMR 15.00: Renewable Energy Portfolio Standard Class II pertaining to waste to energy.

Massachusetts municipalities are under significant pressure from increased disposal costs for solid waste and recycling due to international market changes and dwindling in-state disposal capacity. The MMA has been engaged in discussions to shape the state's forthcoming 2020-2030 Solid Waste Master Plan. We are also pursuing strategies to help alleviate some of the cost pressures on our communities and allow them to manage their solid waste and recycling needs more effectively. Therefore, we support regulatory changes that would incentivize waste-to-energy companies to control tipping fees and other costs to municipalities, as well as make investments in decreasing the environmental and public health impacts of their technology.

The MMA would also like to recommend that DOER not terminate the proposed regulatory changes for RPS Class II – Waste to Energy after five years. Rather, DOER should conduct periodic market reviews to assess the impact of the regulatory changes on costs to energy producers, suppliers, and municipalities.

We thank you for the opportunity to offer comments on the proposed changes to 225 CMR 15.00: Renewable Energy Portfolio Standard Class II. The state must remain a strong partner with municipalities in order to address the challenges to our solid waste and recycling landscape, and chart a sustainable path forward for the Commonwealth. Please note that the MMA's position on the proposed regulatory changes is subject to adjustment based on alignment with the updated solid waste master plan.

If you have any questions regarding our comments, please do not hesitate to have your staff contact me or MMA Legislative Analyst Ariela Lovett at (617) 426-7272, ext. 161 at any time. Thank you very much.

Sincerely,

Geoffrey C. Beckwith  
Executive Director & CEO