

July 26, 2019  
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Massachusetts Department of Energy Resources  
c/o John Wassam  
100 Cambridge St. Suite 1020  
Boston, MA 02114  
DOER.RPS@mass.gov

Submitted electronically

Re: DoER proposed changes to the RPS and APS.

Dear Mr. Wassam,

The goal of the APS is to incentivize clean burning fuels for heating. The science behind the studies submitted to the International Panel on Climate Change (IPCC) clearly demonstrates that the process of chopping down forests to then incinerate for the purpose of generating heat and electricity **is not carbon neutral**. The proposed changes will incentivize removal of a carbon sequestration asset, eliminating the capabilities of that asset to sequester carbon, and rapidly releasing that carbon into the air through burning. We are in a climate crisis brought upon by man-made burning of fossil fuels and the subsequent release of CO<sub>2</sub> into the atmosphere. We need to act now to reduce our CO<sub>2</sub> emissions. The state is under mandate to uphold our climate goals and act according to the best interest of the health and welfare of the citizens of Massachusetts. The state's commissioned report on biomass, the Manomet report came to the conclusion that biomass burning for energy is not carbon neutral but rather pollutes more than conventional fossil fuels. This burning will also increase the particulate emissions, which are strongly regulated by the EPA because of their known danger to our health. I believe the DoER understands the science, burning wood releases CO<sub>2</sub>, and that this is bad for our health and the health of the planet. As public officials it is your underlying core responsibility to protect the health and welfare of your constituency. In this aspect the DoER's proposed changes are a dereliction of duty. Thus I can only wonder why the DoER would propose a rule change that does not uphold the mandates of the Global Warming Solutions Act nor put us on a trajectory towards meeting our climate change goals; which is fundamentally against our own laws.

The proposed changes are a complete sellout to the biomass industry. The proposed changes reduce the facility efficiency requirements for those plants that are burning forest residues and thinning. However, where the definition of a residue is not as one would think, but rather any three harvested for restoration. The proposal goes so far as to redefine more trees as thinnings. Who will be regulating the facility? Nobody. What this allows is energy from more polluting facilities in or out of state to get APS

credits for energy sent to MA. This in turn has the effect of having MA electric rate payers subsidizing an industry that is adding pollution, emissions and CO2, while cutting down a carbon dioxide sink, that being the forests of New England.

Similarly the DoER has proposed changes to the Renewable Energy Portfolio Standard, regarding eliminating SREC I payments ten years after the opt in start date<sup>1</sup>. This endeavor may save the commonwealth a bit of money by not paying out on the tail end for a few solar projects, but does far more damage by renegeing on a financial promise that was codified in the original RPS. This erosion of public trust will deter future prospective solar electric owners from moving forward with solar projects, fearing that the back end earnings that make the system financially feasible will be taken away at a later date. Again, this is bad policy for meeting our goals of moving towards a renewable energy economy.

The DoER should focus its energy on restructuring the financial incentives of the public utilities. At present they are incentivized to build fixed assets, because they can receive nearly a 10% return on investment for those capital asset projects, while also billing the rate payers for any maintenance of those assets. The DoER should work on re-jiggering the financial incentives such that the utilities are financially awarded for:

1. Reliability of service
  - a. Keeping up with maintenance
  - b. Keeping network from being hacked
  - c. Utilizing distributed resources
2. Quotient of renewable energy
3. Low cost of electricity
  - a. Staying on top of maintenance
  - b. Utilizing grid ancillary services of PV systems for frequency and voltage regulation
  - c. Utilizing storage for load shifting

**Until the investor owned public utilities have their financial incentives restructured, we will continue to see a resistance to the adoption of renewable energy, and good energy policy.**

Sincerely,  
Mike Kocsmiersky  
Springfield Green Team