

CALUWE, Inc.
Biomass Heat & Power Solutions
9 Wheatland Street
Burlington MA 01803



June 7, 2019

Mr. John Wassam
Renewable Energy Program Coordinator
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Subject: 225 CMR 14.00—Renewable Energy Portfolio Standard – Class I and 225 CMR 15.00-Renewable Energy Portfolio Standard – Class II

Dear Mr. Wassam,

Caluwe, Inc. is a Biomass Heat and Power equipment company. We primarily import biomass equipment and biomass emission control equipment from Germany and Austria. We are involved in installing biomass equipment in New England. In late 2018 we were awarded a MA DOER Biomass Infrastructure Grant for safety testing and EPA testing of small-scale biomass boilers and very recently we were awarded a USDA Wood Innovations Grant for safety testing and EPA testing of small-scale wood chip fueled Combined Heat & Power equipment from Germany

In general, we like to express our support for the proposed changes to 225 CMR 14.00—Renewable Energy Portfolio Standard – Class I and 225 CMR 15.00-Renewable Energy Portfolio Standard – Class II.

However, we would like to see the following subtle adjustments:

- **Consider adding forest derived materials from “fire mitigation” and “wild life management”, both land management activities.** Several state agencies, like DCR and Fisheries and Wildlife, have obligations within the commonwealth of Massachusetts to actively manage large amounts of land and as such generate a large amount of this material. Because of the associated cost for the removal of this material these land management activities are very often neglected. Allowing this material in the RPS would allow for an incentive to remove this material in an appropriate and economical manner.
- **Consider adding land clearing derived materials (or use change) for state or municipal activities or projects.** These materials are a valuable renewable resource and piling them up somewhere, where they will produce methane from decomposing, is not the correct approach. Wood chips are wood chips, and it doesn't matter from where they come, and if they will be used under RPS or APS; the wood chips don't care! Let's treat them as a valuable energy resource.

- **Consider increasing the minimum required efficiency level to 25% for biomass electric generating facilities.** The commonwealth of Massachusetts should NOT promote any equipment or activities that have 0% efficiency; this makes no sense. The Commonwealth should promote state of the art equipment with a minimum efficiency of 25% for electric generation, in combination with state of the art emission control equipment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Caluwe', is written over a horizontal line. Below this line is another horizontal line, and a long, sweeping horizontal stroke extends to the right, ending in a small upward hook.

Marc J. Caluwe
President

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