

## DOER RPS (ENE)

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**From:** Leslie Bliss <info@email.actionnetwork.org>  
**Sent:** Wednesday, April 28, 2021 9:35 AM  
**To:** DOER RPS (ENE)  
**Subject:** RPS Public Comment

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John Wassam,

Dear Commissioner Woodcock,

I am writing to comment on the proposed amendments to Massachusetts' Renewable Portfolio Standard (RPS) program pertaining to burning woody biomass.

First, I want to thank you for the decision that biomass power plants should not be located in or near Environmental Justice communities. Please keep this amendment without change: ““A Generation Unit using Eligible Biomass Woody Fuel or Manufactured Biomass Fuel that is either: (i) sited in an environmental justice population or (ii) sited within 5 miles of an environmental justice population, shall not qualify as an RPS Class I Renewable Generation Unit.”

Second, I am concerned about your proposal to eliminate efficiency requirements for existing biomass plants. This proposal would allow dozens of highly polluting and inefficient biomass plants across the Northeast to qualify for ratepayer subsidies if they claim to burn “non forest derived residues.” Even if they can prove they are truly burning wood residues, rather than trees logged for fuel, these plants pump out large quantities of health-harming air pollution and greenhouse gas emissions that contribute to climate change.

I urge you to leave the existing biomass eligibility criteria in the RPS intact, while adding the proposed provision to protect environmental justice communities.

Thank you.

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