Wassam, John (ENE)

From: martyrt2@gmail.com <info@email.actionnetwork.org>
Sent: Friday, May 7, 2021 5:36 PM
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 completely agree 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."

I am however concerned about your plans to only require new biomass power plants to meet a 60% efficiency requirement. Under the current RPS regulations, ALL biomass power plants must meet that requirement in order to qualify for renewable energy credits in Massachusetts. Your proposal to eliminate efficiency requirements for existing biomass plants would allow dozens of highly polluting and inefficient biomass plants in Maine and 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.

DOER's plan to use Massachusetts' ratepayer funds to prop up failing out-of-state biomass power plants will do nothing to mitigate climate change, reduce harmful air pollution, or promote new sources of clean, renewable energy. This proposal is inconsistent with the state's

recent acknowledgement of the health impacts from biomass power plant emissions and is a major step backwards for a state that has been a national leader on climate issues.

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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