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April 29, 2021

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

Dear Mr. Wassam and Commissioner Woodcock,

The Northampton Energy and Sustainability Commission fully supports the Environmental Justice provision in the Phase 2 Biomass Changes (225 CMR 14.00) to the Class 1 Renewable Portfolio Standard, but opposes all other proposed amendments, especially the loophole for older inefficient biomass plants.

- The Commission supports the provision to “Prohibit Generation Units using Eligible Biomass Woody Fuel from qualifying for the RPS program if they are located within an environmental justice population or within 5 miles of an environmental justice population.” This would prevent operations such as the inefficient Palmer Renewable Energy biomass electric generating plant, which would further degrade the air quality and public health in Springfield, “the Asthma Capital of the Country” and is a major public health step.
- The Commission, however, objects to all other proposed changes. Those changes do not strengthen our restrictions on biomass eligibility for Renewable Energy Credits. Specifically, the Commission opposes the amendment that “Require(s) all Generation Units with a Commercial Operation Date after 12/31/2020 to meet a 60% overall efficiency requirement...” We request that the DOER **strike the phrase “....with a Commercial Operation Date after 12/31/2020...”** All electric-generating biomass plants **are already required to be 60% efficient, ever since 2012!** This proposal reverses the prohibition on older, thoroughly inefficient biomass plants from qualifying for ratepayer supported financial incentives. Doing so does not increase the amount of truly clean, renewable energy, the purpose of the Renewable Energy Portfolio Standard. Worse, it opens the door to increasing emissions from retooled previously non-qualifying plants in response to the lifting of restrictions.

Sincerely,

Wayne Feiden, FAICP
Director of Planning & Sustainability/ Chair Northampton Energy and Sustainability Commission

Cc: Rep. Lindsay Sabadosa, Sen. Jo Comerford

