

Sally Pick

Tel. 413.367.0082 SJP@crocker.com

PO Box 303, 25 Union St.
Montague, MA 01351

Attention: Commissioner Patrick Woodcock & John Wassam
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

May 14, 2021

Dear Commissioner Woodcock & Mr. Wassam,

I am writing to you to comment on DOER's recently proposed Phase 2 Biomass changes to the Renewable Energy Portfolio Standard (RPS) Class 1.

I commend you on the provision that would "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 change would prevent the construction of the highly polluting Palmer Renewable Energy biomass electric generating plant proposed in an environmental justice community in Springfield, a city designated the Asthma Capital of the U.S. It is a major step forward for public health, environmental justice, and GHG emission reductions mandated by the recently signed climate bill.

That said, I strongly object to **all** other changes proposed by the DOER to the Phase 2 Biomass RPS, changes that would result in **increased** greenhouse gas emissions in New England. The RPS rules are intended to **decrease** GHG emissions, with subsidies for clean energy which does not emit GHGs.

I **oppose** the amendment that "Require[s] all Generation Units with a Commercial Operation Date **after 12/31/2020** to meet a 60% overall efficiency requirement, regardless of the type of feedstock." Since 2012, all electric-generating biomass plants *have already been required to be 60% efficient*, and **this proposal would allow existing, inefficient, high GHG-emitting, non-renewable** biomass plants to qualify for RPS subsidies. It would result in ratepayers subsidizing older, inefficient biomass plants in neighboring states, plants which would otherwise be uneconomical, and runs counter to Governor Baker's commitment to cutting global emissions as a participant in the U.S. Climate Alliance.

Instead, I recommend that the Department **delete the phrase "... with a Commercial Operation Date after 12/31/2020 to..."**, so that **all** biomass plants must continue to meet the current GHG emission standards.

In summary, I wholeheartedly support preventing biomass plants from being built in Environmental Justice communities, while opposing **all** other proposed Phase 2 changes to the RPS.

Thank you for your consideration of these recommendations.

Sincerely,

Sally Pick