

## Wassam, John (ENE)

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**From:** Marty Nathan <martynathan1@gmail.com>  
**Sent:** Thursday, May 6, 2021 10:47 AM  
**To:** DOER RPS (ENE)  
**Cc:** lindsay.sabadosa@mahouse.gov; jo comerford senate  
**Subject:** Climate Action Now Western Mass Comments on DOER proposed changes to RPS Phase 2

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

May 5, 2021

RE: PHASE 2 BIOMASS CHANGES TO 225 CMR 14.00: RENEWABLE ENERGY PORTFOLIO STANDARD - CLASS I

Dear Mr. Wassam and Commissioner Woodcock,

I write to you on behalf of the Steering Committee of Climate Action Now Western Massachusetts, a grassroots regional organization working at all levels of government to prevent cataclysmic climate change and establish environmental justice.

We are writing in response to your recently released proposed Phase 2 Biomass changes to the Commonwealth's Renewable Energy Portfolio Standard Class 1, as posted at <https://www.mass.gov/doc/225-cmr-1500-rps-class-i-phase-2final-clean>.

1. Climate Action Now applauds 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." We have been deeply involved in the struggle to stop the construction of the inefficient Palmer Renewable Energy biomass electric generating plant that was proposed in the midst of a low-income environmental justice community in Springfield, a city twice designated the Asthma Capital of the Country. PRE's plan provided a prime example of the public health threat posed by the toxic pollution of biomass to communities already subject to poor air quality and lack of access to health care resulting in lung, vascular, neurologic and neoplastic disease. This

change in the RPS would prevent clean energy subsidy for plants like Palmer's, and thus is a major step forward for public health in the Commonwealth.

2. However, we object to all other changes proposed by the DOER to the Phase 2 Biomass RPS. Massachusetts' restrictions on biomass eligibility are already the strictest in the country, consistent with the Commonwealth's landmark Manomet Study. Any attempt to weaken them is harmful to the climate and to air quality and does not reflect the state of the science. We are in a climate emergency and cannot move to increase greenhouse gas emissions through RPS rules that were imposed to decrease them and prevent catastrophic warming. Specifically, we 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." All electric-generating biomass plants **are already required to be 60% efficient since 2012!** This proposal provides a loophole for older, thoroughly inefficient and thus non-renewable biomass plants to qualify for ratepayer subsidies. It thus opens the door to increasing emissions during a time when these regulations should be the source of desperately-needed reductions. Providing ratepayer funded incentives to existing inefficient biomass plants would do nothing to increase the amount of truly clean, renewable energy in New England (the original purpose of the Renewable Energy Portfolio Standard).

This is an appalling abuse of one of the Commonwealth's major means of fighting climate change and indicates a DOER obeisance to biomass and forestry industry profit that we hope does not surpass its dedication to climate science and public health.

In summary, we fully support the Environmental Justice change to the Phase 2 Biomass Changes to the Class 1 Renewable Portfolio Standard as a welcome step forward in climate justice. Climate Action Now opposes all other proposed amendments, with particular emphasis on the loophole provided for incentivizing older inefficient biomass plants.

Respectfully submitted,

Martha A. Nathan MD on behalf of the Steering Committee for Climate Action Now Western Massachusetts

Cc: Rep. Lindsay Sabadosa & Sen. Jo Comerford