



May 17, 2021

John Wassam
Department of Energy Resources (DOER)
100 Cambridge Street, Suite 1020
Boston, MA 02114

Via Email: doer.rps@mass.gov

Re: **RPS Class I and RPS Class II Rulemaking - 225 CMR 14.00 and 225 CMR 15.00**

Dear Mr. Wassam:

On behalf of Mass Audubon, I submit the following comments on the proposed changes to the Renewable Portfolio Standard (RPS) regulations, in particular the - Phase 2 biomass provisions.

Mass Audubon supports and appreciates the changes that DOER is proposing that would eliminate eligibility for generation units using woody biomass fuel if they are located in or within 5 miles of an environmental justice community.

However, we continue to strongly oppose proposed changes to the regulations that would roll back efficiency and fuel sourcing requirements that were put in place in 2012. Those provisions are essential to protect air quality, reduce impacts to electricity ratepayers (especially low-income households) and ensure sustainably managed forests.

Mass Audubon opposes regulatory revisions that would:

- Roll back efficiency criteria for biomass generation units in operation prior to 2021 burning “non-forest derived residues,” and broaden the definition of residues;
- Eliminate requirements for biomass generation units to meet air pollution emissions limits in the RPS guidelines;
- Eliminate science-based biomass harvesting standards to protect forests, and replace those provisions with vague sustainable forest management provisions;
- Expand the definition of “forest salvage” to include material harvested under a DCR-approved forest cutting plan; and
- Eliminate fuel tracking requirements, without which there is no mechanism to meaningfully verify compliance with eligible woody biomass fuel guidelines.

The proposed regulations would enable inefficient woody biomass generation plants to qualify under the RPS, diverting millions of dollars in renewable energy subsidies to facilities that will contribute to rather than reduce greenhouse gas emissions and other air pollutants. According to NREL’s 2020 Annual Technology Baseline, dedicated biomass power generation has higher levelized costs of electricity compared to many other forms of renewable generation currently eligible under RPS Class I and II, thanks to dramatic declines in the cost of offshore wind and solar generation resulting from greater deployment and learning effects. The impacts of higher-cost biomass power to ratepayers could

in turn limit the pace of electrification needed to decarbonize the building and transportation sectors by timeframes needed to achieve the sectoral targets required under the Roadmap law. The existing safeguards in the regulations regarding efficiency, emissions limits and required emissions reduction technologies, and sourcing of woody material should, if anything, be strengthened rather than weakened as proposed.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Heidi Ricci". The signature is fluid and cursive, with a prominent loop at the end of the last name.

E. Heidi Ricci
Director of Policy and Advocacy