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Hearing on Proposed changes to RPS regulations

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Massachusetts has always been a leader with a forward looking commitment to climate action. The regulations on biomass energy put in place almost a decade ago have been models for science-based policy making. Governor Baker has publicly recognized the need to shift away from carbon-loaded fossil fuels. He also has an instinct to be cautious with the taxpayers' and ratepayers' money.

However, proposed changes to the RPS regulations that affect biomass energy are contrary to all of those commitments.

I will focus my remarks on just three critical points in the proposed revisions: The proposal to extend the timeframe to calculate climate carbon for biomass by 50%. The expansive new definitions of "wood waste", including the declaration that these are all zero carbon. And reductions in energy efficiency requirements for biomass plants.

The proposed time frame revisions would increase the time to calculate the climate carbon for forest-based biomass from 20 years to 30 years. This logic is faulty because it is not a policy relevant time frame. The time frame must be shortened, not lengthened. The most recent IPCC reports call for dramatic reductions in carbon emissions in the next 10 years - plus a much stronger commitment to forest protection

- The science upon which the Manomet Study rested - which guides current regulations - has only gotten stronger in the last decade with respect to understanding the carbon accounting of biomass energy. This is clear in current peer-review science journals and in a recent study by the science advisors to the European Union.
- Biomass produces more atmospheric carbon than coal for the same amount of power generated. This carbon is not adequately sequestered in forests because forests take decades to regrow.

Here's an analogy. Suppose I have a lovely big piece of chocolate cake and I want to determine the time frame for "calorie neutrality" based on my rather sedentary activity level. If I'm allowed to use say 3 days to reach net zero calories - no worries! Eat the cake! And since my timeframe always rolls forward, I can keep eating cake! Of course the outcomes are likely to be a trip to Macy's for new pants and my doctor warning me about heart attacks - but not a healthy weight.

Second, the revisions propose more expansive definitions of "waste", "residues" and "salvage" wood products, which will be declared as zero emissions. However, this redefinition will actually accelerate the destruction of forests. We have plenty of experience that shows this.

- Europe's experience demonstrates clearly that power-generation at scale rapidly outstrips any conceivable fuel supply from sawmill or other waste.
- Expansively permitting wood cut for "disease prevention" or other damage rapidly leads to clear cutting.
- The European appetite for wood-biomass fuels for power generation has lead to massive logging of old forests in Estonia, Romania - and in the southeastern US. In all of these places, the producers "promised" that only waste products and forestry residues would be used - but in practice they cut forests, claiming they were "unusable" or "damaged".
- A 60 year old oak and a scrawny pine both look the same in pellet form... There is no after the fact correction...

Finally, the proposed revisions would reduce the efficiency requirements from biomass power plants from 60% to 50%. Efficiency requirements should be increased, not decreased

- Electric power generation from biomass is notoriously inefficient. Any one of us would be advised to replace our home heating system if it ran at 65%.
- Decreasing efficiency will produce more atmospheric carbon by definition because more fuel is burned.
- Plus "re-defining" what can be considered "waste" and then giving it the value of zero in the accounting would encourage more burning because it will be even easier to "meet" the lower efficiency target.

In short, these three changes to the RPS regulations and subsidy framework would take Massachusetts in the wrong direction on climate and energy. Each one is misguided. Together they have terrible multiplier effects. They undermine the leadership of the Commonwealth for science-based policy. They contradict Gov. Baker's commitments. They would make the citizens and ratepayers of the commonwealth pay to make the environment worse - not just for my grandchildren, but for my children.

Thank you