

Hon. Anne M. Gobi
Co-Chair, Joint Committee on Environment, Natural Resources and Agriculture
Massachusetts Senate
24 Beacon St., Room 513
Boston, MA 02133

Hon. Smitty Pignatelli
Co-Chair, Joint Committee on Environment, Natural Resources and Agriculture
Massachusetts House of Representatives
24 Beacon St., Room 473-F
Boston, MA 02133

January 21, 2020

Re: H. 853 - An Act to Ensure Greenhouse Gas Emissions Reductions in the Alternative Portfolio Standard

Dear Senator Gobi, Representative Pignatelli, and Members of the Joint Committee on Environment, Natural Resources and Agriculture:

On behalf of the more than 60 undersigned organizations and individuals, we respectfully request that the Environment, Natural Resources and Agriculture Committee issue an “ought to pass” recommendation for H.853 (Provost, *et al.*), *An Act to Ensure Greenhouse Gas Emissions Reductions in the Alternative Portfolio Standard* with amendments, as discussed below.

H.853 removes wood burning and garbage incineration from the list of technologies eligible for renewable heating incentives in the state’s Alternative Portfolio Standard (APS) due to their elevated carbon emissions and harmful air pollution. In addition, in light of sweeping changes to the Renewable Portfolio Standard (RPS) rules proposed by the Baker Administration after H.853 was introduced, we recommend that H.853 be amended to remove eligibility for biomass from the RPS as well.¹ These proposed regulatory changes would roll back MA’s landmark, science-based standards adopted in 2012 that restrict eligibility of inefficient utility-scale biomass power plants.

MA’s Global Warming Solutions Act (GWSA) set an ambitious goal of reducing statewide greenhouse gas emissions by at least 80% below 1990 levels by 2050, yet the Baker Administration is seeking to use the state’s clean energy programs to incentivize wood-burning for heat and electricity. Both the APS regulations that were adopted in 2017, and the RPS rule changes proposed in 2019, would use ratepayer clean energy dollars to fund wood-burning technologies that are far more polluting than fossil fuels.

Baker’s RPS rule changes are imminent.

The Legislature must act this year to ensure the integrity and effectiveness of Massachusetts’ clean energy programs. The release of the final RPS regulations is imminent. MA Attorney General Maura Healey expressed concern that by expanding subsidies for biomass energy and weakening existing safeguards, the amended RPS program “would be inconsistent with the GWSA’s near- and long-term emissions-reduction mandates and its core “anti-backsliding”

¹See Partnership for Policy Integrity (PFPI), [Support Memo for H.853](#), 5/28/19.

purpose.”²

The Legislature has long recognized the importance of reducing greenhouse gas emissions and promoting clean, renewable energy. When the Legislature passed a 2% increase in renewable energy requirements in 2018, the intent was to encourage new clean energy generation, such as wind and solar. Instead the Baker Administration has sought to backfill this requirement by expanding the program to include inefficient and polluting biomass plants that are currently ineligible. Currently there are only a few small, highly efficient biomass power plants that are eligible for the MA RPS. Preemptive action by the Legislature this session can prevent the expansion of this program before any economic or environmental harm is done.

The climate crisis calls for immediate action.

Climate science shows that to avoid catastrophic warming, we must dramatically reduce GHG emissions over the next ten years and increase uptake of CO₂ that’s already in the atmosphere. Healey’s letter notes “In light of the critical role forests play in mitigating emissions, the Commonwealth should be working to preserve and replenish our forests as important carbon sinks, not putting in place incentives to burn them as fuel.”

With such a short timeframe for meaningful climate action, it is imperative that clean energy funding and incentives be used to promote new zero-carbon-emission resources, both for heating and electricity, to displace fossil fuels. At the very least, they should not be used to support technologies that add more carbon dioxide and air pollution than fossil fueled sources.

Massachusetts has already spent several million dollars to promote wood-burning through the APS and is poised to spend exponentially more each year as the program takes off.³ The proposed RPS changes would funnel even more millions to a polluting industry by incentivizing construction and operation of utility-scale wood burning power plants in MA—plants whose smokestack CO₂ emissions are worse than coal per unit of energy generated.⁴

We urge the Committee to amend and report H.853 out favorably by February 5th in order for this legislation to be considered this session, and to ensure that any comprehensive energy legislation introduced includes this language. The Commonwealth will not be able to meet the requirements of the Global Warming Solutions Act if it continues to subsidize polluting technologies through its clean energy programs.

Sincerely,

Mary S. Booth, PhD
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(Signatories continued on next page)

² Office of Attorney General Maura Healey, Comments to DOER on proposed amendments to RPS regulations, 7/26/19. Retrieved from: http://www.pfpi.net/wp-content/uploads/2019/08/MA-AGO-RPS-Biomass-Comments_FINAL1.pdf.

³ See PFPI, [Financial Considerations for H. 853](#), 5/5/19, pp. 2-4.

⁴ See for instance PFPI, [FAQs on the Proposed PRE Power Plant in Springfield and DOER’s Plans to Weaken Biomass Standards in the RPS](#), 5/29/19.

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