

John Tzimirangas, President and CEO
Energy New England
5 Hampshire St., Suite 100
Mansfield, MA 02048

May 29, 2019

Dear Mr. Tzimirangas:

We have learned that ENE has been advising municipal utilities in Eastern Massachusetts to enter into power purchase agreements with Palmer Renewable Energy (PRE), a wood-burning (“biomass”) power plant proposed to be built in Springfield, MA. ENE has been telling MLPs that it is “likely” that the PRE plant will qualify for renewable energy credits (RECS) in Massachusetts.¹

We implore you to stop promoting the PRE biomass power plant in any manner. Our community has fought a long battle to keep that power plant out of East Springfield. Springfield is already recognized as the nation’s Asthma Capital by the Asthma and Allergies Foundation of America, based on asthma prevalence, emergency room visits, and asthma-related deaths. The PRE plant’s air permit allows it to emit 34 tons of particulate matter a year, 13 tons of “hazardous air pollutants” including dioxins, heavy metals, and carcinogenic products of combustion such as benzene and formaldehyde, and over 170 tons combined per year of ozone precursors NO_x, VOCs, and carbon monoxide, plus sulfur dioxide and ammonia. Springfield is already home to a garbage incinerator and other nearby power plants, including Berkshire Power, which was fined \$8.5 million in 2017² and had staff sentenced³ for tampering with emissions monitors and lying about emissions. Burdening our community with another polluting industrial facility, and subsidizing it with public clean energy dollars to the tune of tens of millions of dollars, is wrong on every level.

Building a wood-burning power plant in Springfield will undermine climate and emissions reduction goals in Massachusetts. Biomass power plants emit far more CO₂ per megawatt-hour than coal or natural gas plants. A Massachusetts policy enacted in 2012 by the Patrick administration recognized that burning biomass is not “carbon neutral,” and eliminated renewable energy subsidies for biomass electricity plants, restricting subsidies to small, highly efficient combined heat and power plants. PRE developer Vic Gatto lobbied against those regulations,⁴ and now it appears he’s been heard in Boston, because the Baker administration is proposing to roll back those protections to make low-efficiency plants like PRE eligible for millions per year in public clean energy funding.

¹ <http://www.pfpi.net/wp-content/uploads/2019/05/PRE-PPA-bid.pdf>

² https://www.masslive.com/news/2016/03/berkshire_power_to_pay_85_mill.html

³ <https://www.justice.gov/usao-ma/pr/former-berkshire-power-technician-sentenced-conspiring-tamper-air-pollution-monitors>

⁴ <http://www.pfpi.net/wp-content/uploads/2019/05/Gatto-Victor-Palmer-Renewable-Energy.pdf>

For ENE to take advantage of this regulatory rollback to promote this controversial and polluting plant alongside wind and solar is cynical, but what's truly shocking is to see ENE promoting biomass as "non-emitting"⁵ – and even seeking to *define this in legislation* – apparently counting on MLPs to be ignorant of the true costs and environmental and health impacts of biomass energy. We are particularly outraged that you are seeking to line up financing for this power plant by pushing hypothetical Renewable Energy Credits for wealthier communities at the expense of Springfield's air quality and the health of our residents. This is especially unconscionable when the comment period has not even closed on the proposed regulatory rollbacks that would make it possible for the PRE plant to get renewable energy credits in Massachusetts. In fact, ENE announced its plans to promote Palmer on April 4th, a day *before* DOER announced its proposed RPS rule changes.

We understand that ENE is recommending that municipal light plants purchase RECs from PRE as a "relatively low cost 'hedge' against future green energy costs." Obviously ENE is only considering the costs to municipal utilities for their electric bills, and not the costs borne by people in our community whose health is impaired, lives are cut short, or experience lost work days because we are made sick from the pollution from this plant. The 'hedge' does not even make sense financially given the regulatory uncertainty of these RECs and the widespread opposition to the underlying proposed changes to the RPS regulations.

The apparent assumption by ENE and PRE that power plant developers get to define and legislate away the realities of pollution and climate change for their own financial benefit is deeply repugnant to frontline communities, scientists, and environmental activists. For these reasons our organizations, which are working to protect Springfield and other polluted communities and to promote *true* zero-emissions renewable energy, urge you to stop recommending that municipalities purchase power from Palmer Renewable Energy.

Sincerely,

Tanisha Arena
Director, Arise for Social Justice

Katy Pyle
Lead Organizer, Springfield Climate Justice Coalition

Mary S. Booth, Ph.D.
Director, Partnership for Policy Integrity

⁵ <https://www.ene.org/ene-provides-customers-with-green-portfolio-options/>