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Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350

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The Massachusetts Department of Energy Resources released its [biomass regulations](#) in April 2012. The regulations have disqualified stand-alone biomass power facilities from receiving Renewable Energy Certificates—a ratepayer subsidy under the state’s Renewable Portfolio Standard—though incentives are still available for combined heat and power facilities operating at 50% efficiency, that burn whole trees along with logging “residues.”

The final proposed Massachusetts regulations require that new biomass facilities operate at 60% efficiency to receive full credits under the state’s Renewable Portfolio Standard and 50% efficiency to receive ½ credits. The regulations would also provide ½ credits for facilities operating at 40% efficiency that qualify “as advancement of biomass conversion generation.” Biomass power plants operate at roughly 25% efficiency—in comparison, residential wood stoves operate at 60% or higher. Further, biomass facilities qualifying for Renewable Energy Credits must “yield at least a 50 per cent reduction of greenhouse gas emissions per unit of useful energy” over a 20 year life cycle in comparison to a new natural gas facility.

Regulations allow whole trees to be cut and burned in biomass facilities, while making the distinction between the removal of whole trees and high-nutrient tree tops and branches, referred to as logging “residues.” Varying amounts of this organic material will be required to be left onsite, depending on soil quality, with “bad” soils requiring all “residues” to be left and “good” soils only 25 percent. The maximum amount of leftover organic material that can be removed from any site would be “30% of the weight of the harvest products removed.”

Construction and demolition debris is not eligible for Renewable Energy Credits and is officially banned from incineration in Massachusetts until a study is conducted regarding the health and environmental impacts of burning the materials, according to a source at Massachusetts Department of Environmental Protection. A study was proposed in 2010 by the Mass. DEP, but was not funded. Massachusetts DEP assured me on Wednesday that the ban was still in place today. The State of New Hampshire has [banned](#) the burning of construction and demolition debris since 2007.

Sincerely,

Josh Schlossberg

Editor, The Biomass Monitor

