

Good morning.

My name is Nathan L'Etoile and I am the executive director of the Massachusetts Forest Alliance. MFA is a not for profit trade group that represents foresters, landowners, wood product producers and others, advocating for a strong and sustainable forest economy.

I appreciate the opportunity to comment on these revised regulations and guidelines. There have been some major improvements in the most recent changes proposed to the APS, most notably the attempts to focus more on the stack emissions and the efficiency of qualifying woody biomass systems, and less on things like fuel moisture level. There remain areas of concern that have gone unaddressed, as well as some new concerns with the most recent changes.

While we know that DOER's primary focus is on producing clean energy, MFA is excited about the opportunity provided by the APS to assist with improving air quality in Massachusetts. While it is likely that eligible woody biomass systems incentivized by these standards will replace heating systems that run on fossil fuels such as oil and propane, it is even more likely that they will replace existing, older, less efficient wood heating systems. The leaps in wood heating system technology that have been made in the last decade, and those that we can anticipate in the near future, are impressive. As the prices of these systems fall, and ease of operation and efficiency increase, the prevalence of older wood systems will diminish, and the stigma of wood burning will fade.

While there is much debate about the accuracy of the air quality data that is used to compare Massachusetts to many of its neighboring states, there is no doubt that

woody biomass heating systems that meet the requirements proposed in these regulations will not only displace dirty fossil fuels, but will also replace much of the existing infrastructure of older wood burning systems. The requirements of the APS for systems to reduce greenhouse gas emissions in order to receive credits guarantees that we will not replace clean systems with dirty – what we install, whatever the technology is, will be clean, efficient, and help the Commonwealth achieve its greenhouse gas reduction goals.

MFA, its predecessor organizations, and many of our members individually, have long been involved in discussions of renewable energy policy in the Commonwealth. While we are as eager as anyone to see the regulations and guidelines finalized, we also urge DOER to take the necessary care to “get it right” and maximize the potential for a thermal energy incentive to advance energy diversification, address the challenges posed by greenhouse gas levels, and sustain forests, which provide much to the residents of our state.

I have submitted in depth written testimony on behalf of MFA to the agency, but would like to briefly touch on a few of the major items included in our testimony now –

- **MFA strongly disagrees with the removal of pre-minting as an option for small woody biomass systems.** This simple change almost entirely reduces the likelihood of such systems being installed – without the upfront money to reduce the substantial initial capital cost of these systems, their adoption is doubtful. MFA agrees with DOER’s own report to the legislature that pre-minting is the best option for the ratepayers, and those who seek to install such systems.

- **MFA has asked for either a set aside for those technologies being pushed the hardest to improve** – or a per technology cap that complies with the legislative intent to ensure that all technologies are given an equal chance to compete for credits.
- **MFA has suggested several reasonable and logical changes to the distinctions between thinnings and residues as they are used in the regulations** – currently their usage just doesn't match up with silviculture or on the ground forestry.
- **MFA remains doubtful that the statutory requirement for all biomass systems to be low emission, use efficient energy conversion technologies, and to use fuel that is produced by means of sustainable forestry practices has been met.** As written biomass systems are required to meet the first two, but not the third requirement. This should be addressed before final regulations are released.

Finally, while MFA has drawn attention in our written comments to various flaws in the regulations, and suggested proposals to fix these issues, we are we are happy to participate in further discussions among stakeholders or regulators to clarify our perspective or to help address any issue we or other commenters have raised. We look forward to working with the Baker/Polito Administration as these regulations are finalized.

Thank you for your time here today.