



NORTHAMPTON ENERGY AND SUSTAINABILITY COMMISSION

APPROVED MINUTES

APRIL 29, 2021
4:00 PM – 6:00 PM

Location: Virtual meeting

Members present: Wayne Feiden, Chair, David Pomerantz, Vice Chair, Louis Hasbrouck, Alex Jarrett, Gordon Meadows, Ashley Muspratt, Ben Weil, and Chris Mason (non-voting).

Wayne Feiden opened the meeting and announced that the meeting was being recorded.

Public comment period: Jackie Balance expressed disappointment that the City recently provided a license for a new gas station on King Street, stating that doing so was a missed opportunity to advance the Climate Resilience and Regeneration Plan (CRRP). She also stated that the Mayoral candidate Shanna Fishel would fast-track the CRRP.

Marty Nathan stated that she is hoping the commission will consider two letters under the letter to TUE agenda item: one on biomass regulations and one on proposed changes to the RPS.

Review/approve minutes of 3/25/21 meeting: Ashley moved and David seconded a motion to approve the minutes from the March 2021 NESC meeting. Motion passed unanimously with Louis and Gordon abstaining.

Revolving Fund Approval for work at Leeds Elementary School: Alex moved and Ben seconded a motion to approve allocation of up to \$30,000 from the Energy and Sustainability Revolving Fund to help pay for the design, bidding assistance and construction oversight of an energy recovery ventilation and air source heat pump system for the old section of Leeds Elementary School. Chris explained that the City has applied for a \$12,500 Green Communities grant to support this work and that we do not expect the work to cost more than \$30,000. If we receive the grant, and/or if solicited quotes for the work come in lower than \$30,000, we will not need to expend all the approved funds. The motion was approved unanimously.

Ashley moved and David seconded a motion to approve allocation of up to \$123,000 from the Energy and Sustainability Revolving Fund to help pay for air-sealing and improved insulation of the attic of the old section of Leeds Elementary School. Chris explained that the City received two alternative proposals to improve attic insulation: one would keep the insulation in the attic floor and a second more expensive option would move the insulation to below the roof deck. The second option would result in a fully conditioned attic space that may reduce the cost of installing an ERV/ASHP system. The City has applied for a \$87,500 Green Communities grant to support this work. If we receive the grant and go with the lower cost option, the City won't need to expend more than \$6,860 from the revolving fund. If we receive the grant and go with the more expensive option, the City will need to expend the full amount allocated. If we don't receive the grant and we go with the lower cost option, the City will need to use about \$95,000 of the allocated funds. If we don't receive the grant and are advised to go with the higher

Voting Members: Wayne Feiden, Chair • David Pomerantz, Vice Chair • Jonathan Flagg • Alex Jarrett • Rachel Maiore • Adin Maynard • Gordon Meadows • Ashley Muspratt • Richard Parasiliti • Tim Smith • Ben Weil

Staff advisor, non voting: Chris Mason

cost insulation option, the City will need to seek out additional funds. The motion was approved unanimously.

Letter to state Telecommunications, Utilities, and Energy (TUE) Committee: Marty Nathan had provided a draft letter (attached) on behalf of the NESC to the DOER regarding their proposed biomass amendments to the Renewable Portfolio Standard (RPS). Prompted by a comment from Gordon, the commission discussed adding a local impact statement to the letter to increase the letter's emotional effect. Comments included that doing so would narrow the argument being presented and it would be unlikely to add to the effectiveness of the letter because the points being presented would just be tallied by staff. Marty Nathan stated that the DOER's proposed changes would allow old, inefficient biomass plants to qualify to produce RECs and that Maine is buying up old biomass plants in New Hampshire.

Adel Franks had provided a draft letter to the TUE regarding proposed changes to the RPS that included a premature end to the original SREC 1 program and a reduced penalty to utilities that do not adhere to RPS requirements (attached). A motion was proposed and seconded (my notes failed to record by whom) for Wayne to finalize and send two letters on behalf of the NESC to the DOER and TUE based on the draft letters that are substantially based on the NESC discussion. The motion was approved unanimously.

Discussion of value of investing in updated Greenhouse Gas Emission inventory: Wayne stated that the Planning and Sustainability Department is now blending the CRRP into the Sustainable Northampton Plan (SNP), however, the greenhouse gas (GHG) emission inventory is now out of date. He noted that, while the City wants to be data-driven, they are questioning whether it is worth the resources to redo an inventory that, by the nature of data available, must be of limited accuracy. Ben: Agrees, resources should go to doing, not counting. Gordon: it is time to do something, our plan has no details or specific steps. Ashley: the GHG inventory is static. It would be more useful to have dynamic tools to track sections of the GHG inventory. Wayne thanked the commissioners for their feedback.

Discussion of the value of contributing to the Carbon Disclosure Project: Wayne stated his opinion that reporting GHG emissions through the Carbon Disclosure Project has not really been useful and he suggests that the City "pull the plug" on this effort. No commissioners stated an objection.

Zoning requiring Electric Vehicle Chargers: Wayne announced that the City was developing a zoning requirement for new or substantially renovated parking lots to include a specified amount of EV vehicle charging infrastructure. For lots of 75 parking spots or more, we would require one level 2 EV charger per 25 spaces and underground conduit run to one space per 15 parking spaces. Ashley: density seems low. Conduit should be pervasive. David, just because a lot is paved doesn't preclude it from having conduit and EV chargers added to it in the future. Chris: it would be best if we could base these numbers on actual projected growth in the need for chargers. There should be a consideration of how high an investment in infrastructure is required versus when it is expected to be needed. Ben: suggests the City identify where EV chargers would be most useful and add flexibility to requirements so that dollars are directed toward those locations. He suggests that the city should include identifying locations for level 3 DC fast chargers positioned where there are economic co-benefits. Wayne asked, what is the number? Alex: how can we get more data? Increase your suggested number a bit. How often are lots > 75 spaces built or rebuilt? Wayne: once or twice a year. Alex: likes adding flexibility (Ben's idea). Ben: it could be good to put chargers where people live who can't install chargers themselves (e.g., some apartment

complexes). Gordon: how to set up policies to make sure money goes to where it is most needed. Wayne: flexibility is voluntary. Still looking for a number. Ben: be more aggressive and do it flexibly.

Resilience and Regeneration Plan Actions: Wayne: this will be an ongoing agenda item. We are looking at a bi-annual plan. Nothing specific to discuss today.

Picture Main Street: Wayne described differences between upper and lower / 3 versus 4 lanes / residents versus merchants. Gordon: 4 lanes in upper Main is very helpful. Wayne, there is a trade off with trees, which the commission has supported in the past. Traffic signals are what matters when it comes to traffic flow. Ben: economists state that if you add lanes, traffic goes up. Reduce lanes & some cars will find other paths. Reduced lanes can increase foot traffic. Alex: We have to accommodate state roads. Also, while people don't like congestion, congestion really equals success. There should be short term and handicap parking on Main with longer term parking n side streets to produce a vibrant downtown. Ashley agrees. Wayne: what is NESC interested in? Housing construction, obviously. Traffic, not sure. Alex: advocate for 4th choice. Gordon, no way to do rotary? Wayne: pedestrian traffic problems. Gordon: sees two lanes as a problem.

Florence Streetscapes: Street rees were argued for in CRRP. They cost \$20K per tree in Florence. Gordon expressed surprise at the cost. Wayne: trees cost a lot and need a lot of prep. They are very expensive cost per GHG emission reduction. Denise Lello: we need native trees. Wayne, planning preps, Rich plants trees.

Community Resilience Hub: The City has taken an option to buy the roundhouse building as a potential resiliency hub location. We are now doing due diligence and looking at back up sites. Discussed potential for small micro-grid at roundhouse site. Potential for canopy PV on roundhouse lot is limited and construction RFP has already gone out. The building has a slate roof so rooftop array is out. We could look at an array on the muni-building and pipe over the power. Ben suggested looking at a fuel cell.

Commissioner's Reports: No reports.

Ongoing City Department Projects Status: Wayne: reported on a densification option on Laurel St project, the Habitat for Humanity project and working to include GHG emissions in the capital improvement planning process.

Action Items:

- Wayne to complete and send letters.

The Committee adjourned at 6:00 PM.

Chairman Michael Barrett
Chairman Jeffrey Roy
Joint Committee on Telecommunication, Utilities and Energy
24 Beacon Street
Boston, MA 02133

April 29, 2021

RE: DOER's phase 1 amendments to 225 CMR 14.00 and 225 CMR 15.00— the Renewable Energy Portfolio Standard (RPS).

Dear Telecommunications, Utilities, and Energy (TUE) Joint Committee Chairs Barrett and Roy and Members of the Committee:

We write on behalf of the Northampton Energy and Sustainability Commission.

We understand that the TUE has received a communication from DOER notifying you of Phase 1 amended RPS draft regulations as indicated on their website <https://www.mass.gov/service-details/rps-class-i-ii-rulemaking>. We are writing to express our dismay about two issues in particular.

1). **Premature end to original SREC program** by reducing the length of time that solar owners can participate in the SREC 1 program. Under the original regulation, early participants in the SREC program could continue to produce SRECs until the program ended in 2023. The current draft limits their participation to 10 years. By making such a substantial retroactive change to established rules, DOER would undermine confidence in its solar and other sustainable energy programs going forward. This would damage future efforts to advance clean energy in the Commonwealth by establishing a precedent that the rules can change at any time, thus reducing investors' confidence.

2). **Reducing the penalty for utilities who do not adhere to the RPS requirements** by reducing the MA Class 1 Alternative Compliance Payment (ACP) from its current rate of \$71 to \$40. Importantly in its original rule change proposal in April 2019, DOER proposed to slightly adjust the ACP cap at \$70. While there was discussion during the public comment period about that, there was no public discussion about significant reductions in the ACP amount. Yet now DOER is proposing a \$40 cap on the ACP. This is procedurally flawed and should not be allowed.

Because these proposed amendments would have negative impacts on the future of sustainable energy development in Massachusetts, we respectfully ask that you inform DOER that the TUE is opposed to these two proposals. We ask you to inform DOER that TUE strongly advises 1) continuation of the current, original SREC rules and 2) maintenance of the MA Class 1 ACP cap at approximately \$70.

Further, we ask that TUE use its prerogative to host a hearing of these issues as soon as possible.

Sincerely,

Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114
Attention: John Wassam & Commission Patrick Woodcock

April 29, 2021

RE: PHASE 2 BIOMASS CHANGES TO 225 CMR 14.00: RENEWABLE ENERGY
PORTFOLIO STANDARD - CLASS I

Dear Mr. Wassam and Commissioner Woodcock,

We write on behalf of the Northampton Energy and Sustainability Commission in response to your recently released proposed changes to the Commonwealth's Renewable Energy Portfolio Standard Class 1, particularly the Phase 2 proposed biomass amendments as posted at <https://www.mass.gov/doc/225-cmr-1500-rps-class-iiphase-2final-clean>.

- The Commissions fully supports the provision that would “Prohibit Generation Units using Eligible Biomass Woody Fuel from qualifying for the RPS program if they are located within an environmental justice population or within 5 miles of an environmental justice population.” We have registered our opposition to the construction of the inefficient Palmer Renewable Energy biomass electric generating plant that was proposed for a low-income environmental justice community in Springfield, a city twice designated the Asthma Capital of the Country. It provided a prime example of the threat posed by the toxic pollution of biomass to communities already subject to poor air quality and lack of access to health care. The proposed change in the RPS would prevent plants like Palmer from qualifying for clean energy incentives and thus is a major step forward for public health in the Commonwealth.
- However, the Commission objects to all other changes proposed by the DOER to the Phase 1 Biomass RPS. Massachusetts' restrictions on biomass eligibility for Renewable Energy Credits are already the strictest in the country and the proposed amendments do not strengthen them.
- Specifically, the Commission opposes the amendment that “Require(s) all Generation Units with a Commercial Operation Date after 12/31/2020 to meet a 60% overall efficiency requirement...” We request that the DOER **strike the phrase “...with a Commercial Operation Date after 12/31/2020...”** All electric-generating biomass plants **are already required to be 60% efficient, ever since 2012!** This proposal reverses the prohibition on older, thoroughly inefficient biomass plants from qualifying for ratepayer supported financial incentives. Doing so certainly does nothing to increase the amount of truly clean, renewable energy in New England, the original the purpose of the Renewable Energy Portfolio Standard. Worse, it opens the door to increasing emissions from retooled previously nonqualifying plants in response to the lifting of restrictions.

In summary, the Northampton Energy and Sustainability Commission fully supports the Environmental Justice provision in the Phase 2 Biomass Changes to the Class 1 Renewable Portfolio Standard, but opposes all other proposed amendments, with emphasis on the loophole provided for older inefficient biomass plants.

Respectfully submitted,

Cc: Rep. Lindsay Sabadosa, Sen. Jo Comerford