



May 20, 2022

The Honorable Jeffrey N. Roy
House Chair, Joint Committee on
Telecommunications, Utilities, and Energy
State House Room 42

The Honorable Tackey Chan
House Chair, Joint Committee on Consumer
Protection and Professional Licensure
State House Room 43

The Honorable Bradley H. Jones, Jr.
House Minority Leader
State House Room 124

The Honorable Michael J. Barrett
Senate Chair, Joint Committee on
Telecommunications, Utilities, and Energy
State House Room 109D

The Honorable Cynthia S. Creem
Senate Majority Leader
State House Room 312A

The Honorable Bruce E. Tarr
Senate Minority Leader
State House Room 308

Dear Honorable Members of the Conference Committee,

Thank you for the opportunity to offer comments on **H.4524/S.2842, *An Act advancing offshore wind and clean energy*** as you work to produce final legislation that will move the Commonwealth closer to its ambitious emissions reduction goals. The Environmental League of Massachusetts (ELM) appreciates you and your colleagues' commitment to passing substantive clean energy legislation that builds on the landmark 2050 Roadmap to Net Zero law last year. To hit the goals set by the Legislature, it is imperative that we act quickly and decisively to reduce emissions and increase our clean energy supply as the impacts of climate change will only accelerate in years to come without smart, targeted policymaking. Comprehensive final legislation will also help shape and support our green economy, making Massachusetts a national and global leader in clean energy.

ELM urges inclusion of the following language in any final legislative package approved by the conference committee:

Support for offshore wind development and growth. Final legislation should include strong language supporting the continued growth of offshore wind generation (section 68 of S.2842) with key considerations. Increasing the share of our electricity that comes from offshore wind will only be possible with significant grid modernization (sections 18 and 23 of H.4524) and investments in transmission (sections 15 and 23 of H.4524). ELM urges any transmission planning to account for the regional impacts of offshore wind transmission and to engage stakeholders from multiple states to ensure that any potential for partnership is fully leveraged. We also believe that any offshore wind legislation should account for the significant impacts that the industry can have on the natural resources of the Commonwealth (sections 1 and 20 of H.4524) as well as the opportunity for economic inclusion and environmental justice to be incorporated into the growth of the offshore wind workforce and supply chain (section 11, 20 and 22 of H.4524; sections 8 and 50 of S.2842). Finally, we support lowering remuneration for distribution companies to the greatest extent possible (section 50 of S.2842) and requiring a justification for the requested amount.

Adequate funding for clean energy development. ELM recognizes the significant role that technology and innovation can play in meeting our climate goals, and we highly value the work of the Massachusetts Clean Energy Center to bridge the gap between public and private stakeholders in developing and accelerating the green economy. Robust, sustainable funding for MassCEC is a smart investment by the Commonwealth that will not only bring us closer to net zero, but will also create high-quality jobs, attract outside capital, and make Massachusetts a global competitor in this new and fast-growing sector. We support the inclusion of funding to grow our clean energy economy in both section 8 and 3 of H.4524 and section 9 of S.2842.

Decarbonizing the transportation sector. Transportation accounts for 44% of the Commonwealth's greenhouse gas emissions, the greatest percentage of any sector of the Massachusetts economy. Decarbonizing our vehicles and public transit will require a targeted, multi-pronged approach. To increase adoption of electric vehicles, ELM supports funding and expansion of the MOR-EV program (sections 34 and 67 of S.2842). Notably, increases to EV rebates, shifting rebates to point-of-sale, and the inclusion of used vehicles in the program (sections 34 and 80 of S.2842) will make the already-successful MOR-EV program more accessible to a wider range of customers. Paired with these incentives, ELM also supports language requiring all vehicles sold in Massachusetts to be zero-emission by 2035 (section 57 of S.2842). To further accelerate the electrification of public transit, we also support language requiring the MBTA to transition to a fully-electrified fleet by 2040 (section 52 of S.2842).

Adjusting our clean energy incentives. In the 14 years since the passage of the Global Warming Solutions Act, the Commonwealth has proven to be a national leader in incentivizing clean energy development and deployment. The last decade has offered many valuable lessons about the best practices for our solar incentive programs and renewable portfolio standards, and the Legislature has wisely acted when existing programs and policies need to be modified, updated, or replaced. ELM supports language allowing for Class I solar projects up to 25 kilowatts to be exempt from the net metering cap (section 44 of S.2842) and preventing new biomass projects from counting toward the Renewable Portfolio Standard or the Alternative Portfolio Standard (sections 22-29 of S.2842). We also support directing the Department of Energy Resources to effectively plan for the next stage in the growth of our solar industry by recommending a successor for the SMART program (sections 61 and 73 of S.2842).

Protecting consumers. ELM supports language to end the practice of competitive electric suppliers contracting directly with consumers. In 2021, an investigation by the Attorney General found that this practice, which can misrepresent potential savings to consumers by switching their distribution contracts, cost taxpayers over \$400 million over five years. The language in section 54 of S.2842 is also an important equity issue as low-income residents and communities of color were disproportionately impacted by this practice.

Thank you for your consideration of these important items. Please do not hesitate to reach out with any questions. We look forward to supporting a comprehensive final bill that moves us forward on the path to a net-zero Commonwealth.

Sincerely,

Casey Bowers