

Testimony to DPU regarding Sustainable Marblehead's opposition to MMWEC's request to issue bonds at a public hearing on April 26, 2021, docket # DPU 21-29.

Thank you for the opportunity to share MCAN's concerns about Special Project 2015A and to outline our objections to approving this petition to finance a dirty capacity resource.

I am Sarah Dooling, Executive Director of the Massachusetts Climate Action Network. MCAN is a nonprofit grassroots organization committed to clean energy in buildings and in utility infrastructure by supporting local work and coordinating advocates on pushing for state actions.

MCAN has over 60 chapters in the state. MCAN has four chapters in municipal lighting plant districts that have signed MMWEC's Power Sales Agreement for the proposed Peabody Peaker Plant. These Chapters include Sustainable Marblehead in Marblehead, Sustainable South Shore in Hull, Sustainable Middlesex in Wakefield, and the Berkshire Environmental Action Team, which has done work in Russell.

In addition, MCAN has a total of 88 Chapter members in 2015A Project Participating muni districts.

MCAN has 4 areas of concern for MMWEC's petition to finance a peaker plant powered by natural gas and oil, and the compressor station, proposed to be built on a 4-acre parcel owned by the City of Peabody. As an initial matter, we urge the Department to allow our petition to intervene as a full participant so we have an effective on the record voice in this process.

First, the proposed plant is slated to be located in an already burdened community. Residents in Peabody are already exposed to several local polluting facilities, including 7 hazardous waste sites and 12 large quantity waste generators. The proposed peaker plant is expected to emit 11,000 tons of carbon dioxide annually, despite operating only roughly 240 hours per year, adding to the cumulative health impacts residents already endure. While it is accurate the proposed peaker is less polluting compared to older, existing peaker plants in the state, this comparison is analogous to preferring a stage 1 to a stage 4 cancer diagnosis. Cancer is still cancer; pollution is still pollution. Especially for residents living immediately adjacent to the proposed site. PM 2.5 – that soot known as black carbon – is a documented pollutant from this kind of capacity resource. These super small molecules lodge in the lungs of the elderly and children and cause respiratory diseases, including asthma.

Peabody has been hard hit by the COVID pandemic, a crisis aggravated by poor air quality due to transportation emissions from cars combusting along the extensive network of highways. Research has shown that individuals living in neighborhoods adjacent to highways have a higher likelihood of contracting and dying from COVID. As Peabody begins to recover from COVID, financing the construction of yet another polluting facility threatens the ability of this community to recover and ensures this area is a sacrifice zone.

Second, MCAN opposes the financing of a dirty peaker plant because this level of investment by MMWEC and by public utilities must be directed towards clean energy generation and technology that ensures all of our energy providers are part of the climate solution. Natural gas is **not** a bridge fuel. MCAN is committed to working with our municipal light plants and ratepayers on investing in a clean energy future that integrates energy efficiency, demand reduction, and renewable energy. Exhibit E identifies a request for \$85 Million for construction, with a proposed second bond that would be issued to ensure long-term financing, totaling \$170 Million for this contract. Ratepayers will be saddled with this debt, even if, as MCAN speculates, the proposed peaker plant ceases operation before the debt is paid off. This proposed peaker will become a stranded asset, expensive infrastructure with a limited lifespan because of future regulations that will make its operation too costly and ultimately out of compliance with clean energy policy mandates.

Our third area of concern is the broader and changing state policy context. Climate legislation signed by Gov. Baker in March 2021 will become law in June. The state must reach net zero emissions by 2050. For the first time, municipal light plants are required to meet emissions standards by purchasing 50% non-emitting electricity by 2030 and demonstrating net zero emissions by 2050. This proposed peaker plant undermines these emissions mandates. Moreover, the climate bill also revises the MEPA process that calls into question the legality of citing a dirty capacity resource adjacent to two Environmental Justice communities.

Our final area of concern is the near complete lack of transparency on the part of MMWEC and the participating municipal light plants. As public entities, municipal light plants are supposed to involve residents when committing to major investments. MLP's ability to create a civic culture is one reason why MLPs are preferred to the private investor-owned utilities. However, Special Project 2015A has been discussed mainly behind closed doors. Light Boards have entered into Executive Sessions without informing and updating residents. Many Peabody residents did not

know of this project until recently, nor did other ratepayers in participating municipal light districts know of this project. This entire project has flown under the radar of so many people that will be impacted – by debt and by polluted air.

MCAN urges the Commissioners to review the assumptions behind the need for this project and to re-evaluate the feasibility of clean energy alternatives. MCAN opposes the financing of this dirty peaker plant. We cannot afford to build new emitting public facilities that will make residents sick and undermine the State's ability to reach net zero emissions by 2050. Our window to stem the worst effects of a climate changed world is rapidly closing – and Special Project 2015A slams the window shut for Peabody residents and for other Project Participant customers wanting to be part of the climate solution.

MCAN is committed to working with MMWEC and public utilities on building a livable, breathable future, where clean energy and innovative technology are financed, not dirty capacity resources. Please reject MMWEC's petition for financing this dirty plant.

Thank you.