Plainfield Renewable Energy, an affiliate of

Greenleaf POWER

November 9, 2021

Plainfield Renewable Energy, LLC
c/o Greenleaf Power, LLC
12 Mill Brook Road, 3rd Floor
Plainfield, CT 06374

Connecticut Department of Energy and Environmental Protection
55 Elm Street
Hartford, CT 06106
Attn: DEEP.ENERGYBUREAU@CT.GOV

RE: **Public Act 08-98 AN ACT CONCERNING CONNECTICUT GLOBAL WARMING SOLUTIONS** COMMENT REGARDING ACCOUNTING FOR GREENHOUSE GAS EMISSIONS FROM THE CONSUMPTION OF ELECTRICITY

To Whom It May Concern:

The following comments are offered by Plainfield Renewable Energy (PRE) on the above cited request for comment regarding accounting for greenhouse gas emissions from the consumption of electricity in the state.

PRE is a 37.5 MW biomass gasification plant located in Plainfield, Connecticut that takes in wood waste, diverting it from the waste stream to produce clean, Class I renewable electricity, and employs more than 30 full-time staff (salary and hourly), plus more than 100 contractors during the spring and fall outage seasons. Twenty-five of PRE's employees are hourly, earning on average in excess of $34.10/hour with full benefits and overtime pay.

PRE wishes to associate its comments with those of the Biomass Power Association, submitted separately, which provide a detailed discussion of the carbon impact of biomass energy in accordance with several studies in New England and the United States.

PRE agrees with the DEEP draft greenhouse gas calculation plan for biomass, which uses a lifecycle analysis to calculate the greenhouse gas emissions from biomass for the State's consumption of electricity. As DEEP noted, the lifecycle analysis conforms with international norms, which recognize that CO2 emissions from biomass combustion are equivalent to CO2 sequestered a while fuel's biological feedstock was growing. Thus, the carbon impact of biomass is neutral.

PRE's impact is unique even in comparison to other biomass plants given its operational protocols and gasification technology, which easily support the conclusion that the plant has a

neutral carbon impact. PRE operates in compliance with a strict Fuel Quality Protocol approved by the Department. Each year, PRE consumes between 360,000 and 380,000 tons of woody biomass diverted from regional landfills, open burning or combustion in waste-to-energy facilities. These protocols include inspection of incoming materials and testing of loads for contaminates, like arsenic, that can produce harmful air emissions as well as adverse land and water impacts. PRE converts this material into electricity, providing more than 294,000 megawatt-hours (MWh) annually, or enough to power more than 37,000 homes for a year.

PRE appreciates the opportunity to offer these comments in the instant notice for comment and look forward to working with the Department and the legislature to accurately evaluate the impact of technologies like biomass that allow for the diversion of a waste stream to its highest and best use.

Sincerely,

Mitchell Martin
Operations & Engineering Director
Greenleaf Power, LLC