



September 1, 2023

Department of Environmental Protection  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Thank you for the opportunity to offer comments on the Clean Heat Standard. The Pellet Fuels Institute represents the manufacturers of wood pellets serving domestic heating and barbecue markets in the United States. Wood pellet manufacturing and use as a space heating fuel has widespread economic and environmental benefits, not least of which is offering to consumers a renewable heating fuel with dramatically lower carbon intensity than its fossil fuel marketplace competitors. If the Clean Heat Standard is to have any chance of achieving the noble goals outlined in “A Clean Heat Standard for Massachusetts” published by the Regulatory Assistance Project (RAP), wood pellet heating must be considered an eligible fuel/technology combination.

In the two-page summary authored by RAP the stated goals of the standard include reducing climate pollution, improving energy equity, driving down the carbon intensity of heating residential and commercial buildings and providing consumers with flexibility in choosing their heating options. It is hard to see a scenario where the Commonwealth’s goals for the Clean Heat Standard could be met without making wood pellet heating eligible to generate clean heat credits.

### **Wood Pellets Reduce Climate Pollution**

Wood pellet manufacturing is arguably the renewable energy sector’s best example of the efficient capture and conversion of waste streams into a renewable energy product. According to [data](#) from the U.S. Energy Information Administration, in 2022 wood pellet manufacturers purchased over 7.3 million tons of sawmill residuals and 770,000 tons of secondary wood production manufacturing residuals from upstream forest product manufacturers. These residuals are converted into clean burning wood pellets, simultaneously providing vital cash flow to wood product manufacturers, while also mitigating a waste disposal challenge. Without wood pellet manufacturing these materials could flow into landfills or be burned in place, the carbon consequences of which would far outstrip the carbon intensity of those materials when converted into wood pellets and used for space heating.

### **Wood Pellets Improve Energy Equity**

Wood pellets have long been favored by consumers as a means of generating vital BTUs to heat their homes in a cost-effective manner. New Hampshire’s Department of Energy maintains a

regularly [updated data set](#) of heating fuels that also predominate the Massachusetts heating market as well, and the economic advantage of wood pellet heating is clear. At \$26.32 per MBTU wood pellet heating is more cost effective than Fuel Oil (\$32.36 per MBTU), Propane (\$45.64 per MBTU), Kerosene (\$44.49 per MBTU) and Electric Heat Pumps (\$32.36 per MBTU). Only natural gas (\$20.76 per MBTU) offers consumers a cheaper pathway to BTUs than wood pellets. Paired with the low purchase and installation price of modern pellet appliances, wood pellets offer consumers a pathway to affordable, renewable, low-carbon heat right now.

### **Wood Pellets Reduce the Carbon Intensity of Heating Residential And Commercial Buildings**

In a 2021 report, [“Life Cycle Analysis of Renewable Fuel Standard Implementation for Thermal Pateveralood Pellets and Chips”](#) prepared by Stefan Unnasch and Lucy Buchan from Life Cycle Associates for the Biomass Thermal Energy Council, the authors calculated the carbon intensity per megajoule of a number of common heating fuels and the carbon intensity of wood pellets manufactured from a number of fiber sources, including sawmill residuals. The report found that wood pellets delivered a significant reduction in carbon intensity per megajoule of generated energy, in some instances reducing the carbon intensity of space heating by 65%.

### **Wood Pellets Offer Consumers Flexibility and Choice in their Home Heating Options**

As local, state and federal governmental agencies work towards the decarbonization of our energy needs, the list of fuels and technologies that can meet the required energy needs with a reduced carbon intensity dwindles dramatically. In many instances, the electrification of space heating via heat pumps is offered as the only low carbon option limiting greatly consumer choice and flexibility. Wood pellets are a low-carbon home heating option available in the marketplace today and making them ineligible for clean heat credits would undermine the Commonwealth’s ambition of offering consumers flexibility and choice.

Wood pellets may well be this country’s least celebrated, but most deserving clean heat technology available to consumers today. We hope the Commonwealth will include modern wood pellet heating in their technologies eligible for generating clean heat credits.

Very respectfully,

Tim Portz  
Executive Director  
Pellet Fuels Institute