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David Musselman  
Director of Municipal Energy Unit  
Environment Department, Room 709  
City of Boston, 1 City Hall Square  
Boston, MA 02201

Via email: [david.musselman@boston.gov](mailto:david.musselman@boston.gov)

May 17, 2019

Dear Mr. Musselman,

Thank you for the opportunity to comment on Boston's draft *Community Choice Power Supply Program Aggregation Plan*. Mass Audubon commends the City for considering an increase in the renewable energy content of its power supply through this process, and we urge you to adopt the strongest renewable component possible during the next phases of planning.

As Massachusetts' largest nature conservation nonprofit, Mass Audubon protects nearly 38,000 acres of land throughout the state. We are committed to protecting our state's natural treasures for wildlife and for all people.

Climate change is the single greatest threat facing the nature of Massachusetts, and we are already seeing its effects through warming temperatures, shifting seasons, and rising sea levels. Many communities are taking measures to prepare for impacts like extreme precipitation and flood risks, completing vulnerability assessments and developing action-oriented plans to improve their resiliency.

But we still have an opportunity to prevent the worst of these impacts from occurring, if we take bold and immediate action. For our part, Mass Audubon has eliminated all carbon emissions from our electricity use through the purchase of renewable power and through on-site solar generation from our own 44 photovoltaic arrays. Most locally, at our Boston Nature Center in Mattapan, the George Robert White Environmental Conservation Center incorporates photovoltaics using four different arrays (pole mounted, roof mounted, ground mounted and roof shingles) as a demonstration.

Local efforts to reduce emissions at the community level are another crucial way to make a difference - that's why developing strong Community Choice Aggregation (CCA) programs is so important. The opportunity to incorporate renewable energy components into CCA programs allows communities to take emissions reductions into their own hands, rather than waiting for statewide or national policies to be voted into law.

As the largest city in Massachusetts, Boston has a significant opportunity to serve as a leader in showcasing how CCA plans can serve as climate mitigation strategies. We strongly encourage you move forward with the option in part 11.4 of the draft plan to solicit bids for procurement of additional Renewable Energy Certificates beyond those required by the Massachusetts Renewable Portfolio Standard (RPS).

For example, the Green Energy Consumers Alliance's "Green Municipal Aggregation" model recommends communities add at least 5% more Class I renewable energy per year into their electricity supply, compared to the 1% per year required by the RPS. Some communities also choose to set their initial base percentage higher – Brookline, for instance, has set their base percentage at 39% compared to the state's 14%, and the City of Newton recently made the decision to set theirs at 60%. We hope Boston will follow the example of these forward-thinking communities as it finalizes its CCA plan.

Thank you for considering our input, and for furthering the City of Boston's commitment to climate change mitigation.

Sincerely,



Jack Clarke  
Director of Public Policy & Government Relations