

May 10, 2021

Charles Orphanos, Director  
Massachusetts Municipal Wholesale Electric Company  
327 Moody Street  
Ludlow, MA 01056

Dear Mr. Orphanos,

As Massachusetts health professionals, we strongly oppose the Peabody Peaker Plant (Project 2015A) - a project that expands natural gas and oil infrastructure, threatens the health of the surrounding community, and is in direct conflict with Massachusetts' greenhouse gas reduction mandate. Furthermore, Project 2015A is not needed as the demand for natural gas is declining and cleaner energy sources are becoming available.

The Peabody Peaker Plant includes a 200,000-gallon oil tank and the installation of a natural gas compressor within half a mile of Peabody, which as of 2020 is one of 20 state-designated environmental justice communities. In these communities, (1) households earn less than or equal to 65% of the statewide household median income, (2) at least 25% of the residents are minorities, (3) at least 25% of the residents are foreign-born, or (4) at least 25% of the residents lack English language proficiency.

The residents of Peabody currently have higher than state average rates of air-pollution related illnesses, and the air pollution associated with the new plant will increase mortality within the Peabody community. For every 10  $\mu\text{g}/\text{m}^3$  increase of  $\text{PM}_{2.5}$  particulate matter pollution, all-cause mortality increases by 7.3%. The Peabody Peaker Plant is projected to increase  $\text{PM}_{2.5}$  pollution to 21.3  $\mu\text{g}/\text{m}^3$  and as such can be expected to increase mortality rates in the surrounding communities.

The effects of the proposed Peaker Plant on climate change cannot be overstated. Its estimated greenhouse gas emissions, not including emissions associated with drilling and transporting natural gas, are 51,000 tons of carbon dioxide per year -- the equivalent of adding 11,000 cars to Massachusetts' roads per year. The Peaker Plant is therefore antithetical to the Global Warming Solution Act and the recently passed Roadmap for Massachusetts climate policy, which mandates a 50% reduction in greenhouse gas emissions by 2030.

Perhaps the most damning fact about this project is that it is simply not necessary. A 2015 study commissioned by Massachusetts Attorney General Maura Healey demonstrated that the energy needs of Massachusetts can be met without new gas infrastructure, and projections show that demand for natural gas will continue to decline. In the event that this costly and dangerous project is realized, it will almost certainly become a "stranded asset" - a faulty investment of little or no value in the urgent transition to a green energy economy.

A transition to net zero emissions in our energy generation sector will demand that fossil fuel plants cease operations soon. Massachusetts Municipal Wholesale Electric Company should spare ratepayers the expense of a stranded asset and protect the health of the communities it serves by adopting a renewables plus storage model instead of expanding the use of fossil fuels.

The proposed Peabody Peaker Plant will worsen air quality, exacerbate health inequities, and harm the health of all Massachusetts residents. We call for an end to this misguided project.

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