

**WWPI Comments to the
MT House Federal Relations, Energy, and Telecommunications
Committee**

9 February 2015

The Western Wood Preservers Institute (WWPI) support the goals of Montana's Renewable Energy Portfolio Standard which generally are to incentivize use of renewable resources to produce power in order to reduce use and dependence on fossil fuels, reduce emissions of greenhouse gases (GHG), and improve Montana's economy. During the 2013 Legislative session, we supported SB 325 to include used treated wood within the definition of an "eligible renewable resource." This potential was greatly limited by insertion of language limiting use to "a facility that has a nameplate capacity of 5 megawatts or less." HB 401 would remove this limitation.

Use of used treated wood as fuel supports goals of Renewable Resource Standard.

- Use of material that otherwise would be a waste is "renewable."
- Wood is renewable. Carbon removed during growth is released when combusted.
- Plant to convert used treated wood into fuel in Montana would provide jobs and taxes and can operate 24/7 to meet "base load" energy needs..
- Use of treated wood derived fuel would help Montana utilities meet goal of CO₂ emission reduction in Clean Power Plan by providing low-carbon alternative to coal.
- Release of potentially hazardous emissions are minimized by existing DEQ and EPA regulations requiring air emission permits that require combustion and emission control systems appropriate for approved fuels.
- If used treated wood is not beneficially used as fuel, most will instead be disposed in landfills, thus contributing methane, a potent GHG, to the atmosphere as the wood anerobically decays and using valuable landfill capacity.

The 5-MW facility capacity limit unnecessarily prevents most likely used treated wood fuel applications.

- The most likely use of treated wood derived fuel is in medium sized boilers or power plants (generally greater than 100 MW) where fossil fuel offset would reduce CO₂ emissions proportionately.

Recommendation

The Western Wood Preservers Institute (WWPI) urges the FRET Committee to consider legislative change that would eliminate the limit to only facilities of up to 5 MW. While a concern for toxic emissions is valid, please note that toxics control is the responsibility of the DEQ, who will require appropriate combustion and emission control equipment, monitoring, and reporting in accordance with a permit that they will issue. Expanding the potential for use of used treated wood as a renewable energy source in Montana will demonstrate that Montana is open to and supportive of innovative businesses that seek to offer renewable, low-carbon, economical sources of energy. We ask that the FRET committee approve HB 401.

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