
To: Chris Geissler, Todd Schatzki
Cc: Dave Cavanaugh
From: Bill Fowler
Date: April 22, 2021
Subject: Pathways Modeling - MSW

As you're formulating your models for FCEM and Carbon Pricing, I know you'll need to figure out how to characterize MSW in the various models. My suggestion is that you consider MSW as "clean" and thus in the mix that is eligible for CECs. Because MSW facilities offset large amounts of methane emissions from landfills, they can be considered net negative for overall GHG emissions, despite the actual CO₂ that they do release. As a result, MSW is currently exempted from RGGI in New England, and is also exempted from the need to buy MASS carbon offsets. If you were to create a rule, say, that just mirrors RGGI as far as what constituted "clean" then that could avoid having to go through a technology-by-technology assessment fraught with (political) judgment. While no one knows what the future holds for regulation, modeling based on the current regulatory framework seems most appropriate.

Please let me know what you think.

-Bill

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