



Ms. Lauren Morris
Department of Public Utilities
One South Station, Boston, MA 02110

April 26, 2021

RE: DPU Docket 21-29, Petition of Massachusetts Municipal Wholesale Electric Company for authorization and approval to issue revenue bonds

Dear Ms. Morris,

We are writing as physicians and members of Climate Code Blue, an organization that includes experts in internal medicine, surgery, psychiatry, pediatrics, air pollution and infectious disease and whose mission is to promote community action to address the climate emergency. We oppose the Peabody Peaker Plant (Project 2015A), which expands natural gas and oil infrastructure in direct conflict with Massachusetts' greenhouse gas reduction targets. This project also threatens the health of environmental justice communities. Furthermore, Project 2015A is not needed as the demand for natural gas oil continues to decline.

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 cities in the Commonwealth that houses 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 or (3) at least 25% of the residents are foreign-born or (4) at least 25% of the residents lack English language proficiency. These vulnerable populations are disproportionately affected by climate change and pollution for several reasons, including their proximity to health-damaging emissions from facilities such as the Peabody Peaker Plant, their lack of financial resources to rebuild after extreme weather events, and the lack of climate-resilient infrastructure.

Recognizing the disproportionate health burden from climate change experienced by marginalized populations, we have joined over 100 public health groups and medical societies--including the American Academy of Pediatrics, the American Medical Association, and the American Public Health Association — in signing on to the U.S. Call to Action on Climate Health



and Equity: A Policy Action Agenda. As physicians, we recognize that climate change is a health emergency and that we must prevent further harm to our patients, particularly children, the elderly, and those in environmental justice communities.

The residents of Peabody currently have higher than state average rates of air-pollution related illnesses. Given their baseline level of cardiovascular and respiratory disease, Peabody residents are more sensitive to the worsening air pollution that is associated with building and operating the Peabody Peaker Plant.

In addition to worsening existing heart and lung disease, the air pollution associated with the new plant will increase mortality within the Peabody community. Recent literature has shown that 13% of deaths in the U.S. are attributable to burning fossil fuels. Furthermore, for every increase of 10 µg per cubic meter of particulate matter that is less than 2.5 microns (PM_{2.5}), all-cause mortality increases by 7.3%. The Peabody Peaker Plant is projected to increase PM_{2.5} to 21.3 ug/m³ and as such can be expected to increase mortality rates in the surrounding communities.

Given the concern regarding the effects of natural gas on public health, the Peabody Board of Health wrote a letter to Governor Baker in 2018 requesting a Comprehensive Health Impact Assessment (CHIA) be performed prior to permitting new gas infrastructure to be built. Since then, over 100 Boards of Health across Massachusetts and the Massachusetts Medical Society have written similar requests. The Next Generation Roadmap Climate Act also requires an environmental impact report for projects that are located within 5 miles of an environmental justice community and are likely to negatively impact the environment. We agree with the Boards of Health that a CHIA, including a safety assessment and an environmental impact report must be performed to delineate the public health consequences of the Peabody Peaker Plant. Per the Roadmap Climate Act, the Peabody Conservation Commission also must be given the opportunity to review plans for significant projects.

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 proposes an at least 50% reduction in greenhouse gas emissions by 2030. Without these emissions reductions, the Intergovernmental Panel on Climate Change predicts that we will be unable to avoid the most catastrophic effects of climate change.

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.

Building an inefficient, unnecessary peaker plant that worsens air quality and health exacerbates health inequalities for the surrounding disadvantaged communities and is harmful to the health of Massachusetts residents more broadly. Given the significant health implications for the environmental justice communities of Peabody, we call for an end to this misguided project.

Sincerely,

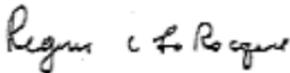
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