

The federal Clean Air Act also limits greenhouse gas emissions from both existing and new power plants. Any modern natural gas combined-cycle power plant would meet the Environmental Protection Agency's emission rate limits (that is, limits per unit of electricity produced) for new power plants. However, Massachusetts' own climate law requires a higher standard based on the total number of tons of CO₂ emitted.

5. CONCLUSION

As the Somerset community works with the state and the Brayton Point property owners to determine the best option for reusing the site, they must weigh many important considerations. Three of the key considerations highlighted in this report are:

1. **In a time when climate change is at the forefront of our decision making in planning for the future, especially in coastal communities such as Somerset, consideration of a true *Clean Energy Hub* should be at the top of any list of potential options for the Brayton Point site.** A clean energy site, including solar PV, food waste digesters, battery storage, and an interconnection for large amounts of offshore wind, would help the state to meet its climate goals, diversify the region's energy sources, encourage green investments in the state, and could bring in a reasonable amount of revenue for the community if PILOTs are well-negotiated.
2. **There is no need for a large new power plant to replace the power being generated by Brayton Point.** There is more than enough power generating capacity in New England to keep the lights on in Somerset and surrounding communities after the Brayton Point plant shuts down. The reliability of the electric system is ensured by ISO New England, whose job it is to plan for the loss of individual generators like Brayton Point. ISO New England has determined that the system will be fine without Brayton Point.
3. **The community's best chance of regaining significant tax revenues following the closure of Brayton Point will be to negotiate strong PILOT payments with the owners of whatever new resources are built on the site.** As it evaluates alternatives, the town should seek to diversify the uses at the site to promote a more sustainable revenue base in the future—one that will not suddenly disappear when a plant owner closes up shop. It will be important to negotiate payment terms for whatever options are chosen that will balance the economic interests of the town with the desire to attract certain users.

There is no immediate need—and certainly no overwhelming benefit—to rush to build a large new gas-fired unit in the place of the retiring coal plant. With so many other options for reuse of the Brayton Point site, the community should carefully consider the future they wish to see for this waterfront property. Alternative options such as the *Clean Energy Hub* scenario show a vision of the future that would allow for the restoration of some of the town's tax revenues, provide clean, reliable electricity for the region, provide jobs and help advance technological innovation, and reduce pollution and other industrial burdens on the town's waterfront and surrounding communities.

