



November 13, 2025

Joint Committee on Telecommunications, Utilities, and Energy
Massachusetts General Court
24 Beacon Street
Boston, MA 02133

RE: RE: Opposition to H. 3582, H. 3583, and Related Legislation Restricting Gas Infrastructure Development

Dear Chairman Barrett and Chairman Cusack,

On behalf of the American Biogas Council (ABC), representing more than 400 companies across the U.S. biogas supply chain, we respectfully oppose H. 3582, H. 3583, and any related proposals to impose moratoria on gas system expansion in Massachusetts. While we share the Commonwealth's commitment to achieving its climate goals, these bills would unintentionally restrict the very infrastructure needed to deliver renewable natural gas (RNG) and other low-carbon fuels critical to that transition.

As drafted, the legislation would prohibit the approval or expansion of any "combustible fuel facility," defined to include oil, natural gas, renewable natural gas, and hydrogen. Such broad language would halt the development of infrastructure necessary to transport low-carbon, renewable gases produced from organic waste, fuels that are already helping states meet emissions-reduction targets and decarbonize hard-to-electrify sectors like transportation, manufacturing, and heating.

Biogas projects recycle manure, food scraps, wastewater, and other organic waste into clean energy and nutrient-rich soil products. When upgraded and injected into the gas grid, RNG achieves some of the lowest carbon intensity (CI) scores of any fuel, often carbon-negative and provides reliable, dispatchable energy that can be produced 24/7. These systems not only reduce methane emissions from waste but also provide baseload renewable power that complements wind, solar, and electrification efforts.

By freezing new or expanded gas infrastructure, these bills would stall investment in renewable gas, jeopardize waste recycling projects, and slow progress toward the Commonwealth's own climate and waste-diversion goals. Just as decarbonizing the electric grid did not require dismantling it, Massachusetts should modernize rather than restrict its gas distribution network to carry cleaner fuels.

The American Biogas Council respectfully urges the Committee to reject H. 3582, H. 3583, and any similar proposals. We appreciate the Committee's attention to these important issues and welcome continued dialogue on how biogas can support Massachusetts' clean energy and climate goals.

Sincerely,

Jonathan Harding

Manager of State Policy

About the American Biogas Council

The American Biogas Council is the voice of the US biogas industry dedicated to maximizing carbon reduction and economic growth using biogas systems. We represent more than 400 companies in all parts of the biogas supply chain who are leading the way to a better future by maximizing all the positive environmental and economic impacts biogas systems offer when they recycle organic material into renewable energy and soil products. Learn more online at www.AmericanBiogasCouncil.org, Twitter [@ambiogascouncil](https://twitter.com/ambiogascouncil), and [LinkedIn](https://www.linkedin.com/company/ambiogascouncil)