

DOCKETED	
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Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
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Comment Received From: CALIFORNIA BIOMASS ENERGY ALLIANCE (CBEA)
Submitted On: 6/4/2025
Docket Number: 21-RPS-02

**Comments of the California Biomass Energy Alliance on the
Renewables Portfolio Standard 10th Edition Guidebook Update**

RE: Comments of the California Biomass Energy Alliance on the Renewables Portfolio
Standard 10th Edition Guidebook Update
DOCKET #: 21-RPS-02

Additional submitted attachment is included below.



June 04, 2025

Submitted Via CEC E-Comment Portal

California Energy Commission
Docket Unit, MS-4
Docket #: 21-RPS-02
715 P Street
Sacramento, CA 95814

**RE: Comments of the California Biomass Energy Alliance on the
Renewables Portfolio Standard 10th Edition Guidebook Update**
DOCKET #: 21-RPS-02

The California Biomass Energy Alliance appreciates the opportunity to comment on the outline of proposed changes to the RPS Guidebook as presented at "Scoping Meeting on Proposed Updates for the RPS Eligibility Guidebook, 10th Edition" May 21st. CBEA is only commenting on the section "Facilities with Air Permits."


Most if not all of California's wood waste biomass power generating facilities have Title V permits. These facilities already compile and submit detailed emissions information to multiple agencies (e.g., CARB, EPA, RCEA, and local air districts). These include annual emissions inventory reports, GHG verifications, and other compliance submittals as required by our permit conditions.

In principle, the requirement to submit emissions documentation does not pose an operational issue, provided the RPS Guidebook allows facilities to submit existing documentation already reviewed by regulatory agencies (e.g., Title V Annual Compliance Certifications, Emissions Inventory Reports, third-party GHG verifications). However, if the CEC intends to create a separate or duplicative reporting mechanism, it could impose unnecessary administrative burden on fully compliant facilities.

Additionally, the proposed language around certification suspension for noncompliance is vague. It would be helpful for CEC to clarify what constitutes "noncompliance" (e.g., administrative errors vs. permit exceedances) and what due process would be afforded before any action is taken.

Please reach out if you have any questions about CBEA member facility operations. We look forward to continuing working with you on this.

Sincerely,
California Biomass Energy Alliance (CBEA)


Julie Malinowski-Bell, Executive Director