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**CBEA Comments on the CEC-Joint Agency SB 100 Workshop;
Draft Results & Implementation Challenges Workshop**

Additional submitted attachment is included below.



March 12, 2026

California Energy Commission
Docket Unit, MS-4
Docket No. 23-SB-100
715 P Street
Sacramento, CA 95814

**Re: CBEA Comments on the CEC/Joint Agency SB 100 Workshop
Draft Results & Implementation Challenges Workshop**

Workshop Date: 02/19/2026

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The California Biomass Energy Alliance (CBEA) hereby submits comments on the February 19, 2026, SB 100 Draft Results Workshop. CBEA is the trade organization of California's woody biomass energy industry. CBEA was created more than 30 years ago with a charter to promote biomass energy as a means to reach the environmental and economic goals of California. On behalf of its members, we have worked diligently as the leading advocate of the solid fuel biomass power industry through California's energy crisis, the introduction and implementation of renewable portfolio standards and waste reduction mandates, through to today's carbon-constrained world governed by AB 32's and SB 100's greenhouse-gas emissions-reduction requirements.

The workshop presented modeling results that will be part of the upcoming SB 100 Report, including modeling on air quality and related public health impacts, and modeling on alternative future energy scenarios. Based on an answer to our question at the workshop, the air quality modeling followed ARB protocols and treated biomass as carbon and emissions neutral, due to the fact that energy use avoids alternative disposal practices, including open burning of biomass wastes and residues. However, the scenario modeling treats biomass in the same way that it treats fossil fuels, to the detriment of both fossil fuel elimination and clean energy development.

Improving California's air quality and public health was a major part of the rationale for enacting SB 100. The air quality and public health impacts modeling that was presented at the workshop is a major component of the analysis that will underpin the forthcoming SB 100 Report, and combustion in power plants is a major contributor to emissions in the state that contribute to health problems and greenhouse gas emissions. Bioenergy production is excluded from the analysis because the use of biomass and biogas resources for energy production diverts these resources from conventional disposal options such as open burning and landfill disposal, both of which contribute higher levels

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of greenhouse gas emissions than bioenergy power plants, and both of which contribute harmful toxins and, in the case of open burning, criteria pollutants to the atmosphere. In addition, the beneficial use of biomass from forestry treatment operations reduces wildfire risks, and wildfires are the source of the worst air pollution episodes that occur in the state.

It is crucially important that the forthcoming SB 100 Report makes it crystal clear that energy production from biomass and biogas does not contribute to the health and greenhouse-gas impacts that are presented in the report. All of the greenhouse-gas emissions and health impacts that are modeled in the report are the result of fossil fuel use for electricity production. This needs to be highlighted.

CBEA reiterates its concern about the combustion retirement scenario. Combustion is a conversion technology, not an energy resource. We believe that the real motivation behind the combustion retirement scenario is the elimination of fossil fuels from the energy mix supplying California's electricity grid, a goal we firmly support. Unfortunately, focusing on combustion instead of fossil fuel elimination causes the scenario to include the retirement of biomass and biogas generators as well as fossil fuel generators. The major attribute that fossil fuel generators provide to the grid is reliability. Biomass generators deliver a level of reliability that is equivalent to what fossil fuel generators provide. Retiring fossil fuel generation from the grid supply mix entails a significant loss of reliability. Retiring biomass generation at the same time not only entails an additional loss of reliability, but it also eliminates a reliable clean energy alternative that supplies high reliability without the limitations or costs of storage.

Slide 43 from the presentation slide deck states that the combustion retirement scenario has both high exports and high storage losses. This is a direct result of the heavy dependence of this scenario on solar paired with storage to substitute not only for the retirement of the state's fossil fuel generators, but also for the retirement of the state's biomass and biogas generators. We note that in a system with a heavy dependence on storage charged by solar the marginal contribution of additional solar to creating surplus generation increases exponentially compared to the average of solar already on the grid. As slide 46 demonstrates, the combustion retirement scenario is the highest cost scenario considered in the analysis. Again, this is a direct result of the heavy dependence of this scenario on solar paired with storage. Removing biomass generators from the retirement scenario would reduce the amount of solar paired with storage needed to make this scenario work, with reductions in cost, exports, and storage losses, and an increase in the amount of reliable clean energy generation on the grid.

We do not know whether it is too late to convert the combustion retirement scenario to a fossil fuel retirement scenario. The elimination of fossil fuel use in California is a laudable

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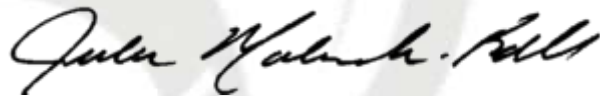
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goal, and the scenario would be significantly strengthened by focusing the scenario on reducing fossil fuel use and leaving biomass in the clean energy mix. We strongly encourage extending the scenario modeling process to allow the combustion retirement scenario to be converted to a fossil fuel retirement scenario. The fossil fuel retirement scenario would compare more favorably with the other scenarios in terms of costs, exports, and storage losses than the combustion retirement scenario, and it is the only scenario that eliminates fossil fuel use from the electric energy supply mix.

In the event that the combustion retirement scenario cannot be converted into a fossil fuel retirement scenario, the accompanying text should make it clear that this scenario eliminates biomass and biogas, which are clean and reliable energy sources, as well as fossil fuels. Further, it should make it clear that if biomass and biogas were excluded from retirement in this scenario, the scenario would become more competitive with the other scenarios that are included in the scenario modeling study, and it would eliminate fossil fuels from the grid energy supply mix.

Thank you for the opportunity to comment. Please reach out if you have any questions.

Best regards,



Julee Malinowski-Ball, Executive Director
California Biomass Energy Alliance (CBEA)

JMB/kmg