

**DOCKETED**

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*Comment Received From: Dennis Balakian  
Submitted On: 5/20/2026  
Docket Number: 26-ALT-01*

**West Coast Waste Inc's Comments on the 2026 - 2027 Clean  
Trasportation Investment Plan**

*Additional submitted attachment is included below.*



West Coast Waste Inc.  
3077 S. Golden State Frontage Road  
Fresno, California 93725

May 21, 2026

Mabel Aceves  
California Energy Commission  
Docket 26-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814

**RE: DRAFT 2026-2027 CLEAN TRANSPORTATION PROGRAM INVESTMENT PLAN  
UPDATE**

Dear Ms. Aceves,

West Coast Waste (WCW) appreciates the opportunity to provide public comments regarding the California Energy Commission's (CEC) Draft 2026-2027 Clean Transportation Investment Plan. For more than 20 years, West Coast Waste has operated a major recycling and organic material recovery facility in Fresno, acting as a critical clearinghouse for agricultural, municipal, and regional wood waste processing. We are deeply invested in California's transition to a sustainable future, but we are increasingly concerned by a fundamental disconnect in the state's clean energy strategy.

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## **The Infrastructure Impasse: Neglecting Production While Funding Dispensers**

The core vulnerability of the current Draft Investment Plan lies in its lopsided funding strategy. The CEC proposes to heavily subsidize the deployment of electric vehicle (EV) charging ports and retail hydrogen dispensers, yet provides zero allocation to support the localized *production* of the renewable fuel and electricity required to supply them.

High-capacity EV charging corridors and fast-fill hydrogen hubs require unprecedented blocks of electrical energy. If on-site, distributed renewable generation is not directly funded, these dispensing systems must draw entirely from an overtaxed electrical grid. California's grid infrastructure is already visibly strained—a condition heavily worsened by the massive power profiles of newly approved commercial data centers. It is unrealistic to expect utility infrastructure to seamlessly absorb this rapid charging deployment without localized baseload generation to anchor it.

## **The Feedstock Flood: The Closing of Biomass Markets Amid a Waste Crisis**

From our perspective as processors on the ground in Fresno, the Central Valley is experiencing an unprecedented biomass disposal crisis. Over the past decade, a sweeping wave of closures has permanently shut down the vast majority of California's legacy biomass combustion power plants. Just as our primary industrial outlets for wood waste disappeared, the volume of incoming feedstock dramatically multiplied due to the full implementation of comprehensive open-field burning prohibitions across the San Joaquin Valley.

We are receiving thousands of tons of clean, woody biomass from agricultural operations and clearing efforts in high-hazard forest zones, yet traditional disposal markets no longer exist.

This materials bottleneck represents a massive, completely wasted opportunity. The San Joaquin Valley and the greater Fresno area suffer from some of the most severe, chronic air quality challenges in the nation. Instead of leaving biomass piles to decompose or exacerbate wildfire risks, the state

must deploy modern, clean, thermal conversion technologies that turn this waste into transportation fuel without open-air emissions. The technology to do this exists today, and advanced biomass-to-hydrogen direct conversion is fully ready for commercial demonstration.

With federal policy actively shifting away from early-stage renewable funding, the U.S. Department of Energy (DOE) will not bridge this commercialization gap. Leadership falls squarely on California and the CEC.

### **A Commercial Fleet Vision: From Waste Handling to ZEV Fueling**

West Coast Waste is ready to step up and act as part of the solution. We are actively planning the comprehensive conversion of our heavy-duty collection, grinding, and transport fleet to Zero-Emission Vehicles (ZEVs). However, we are fiercely opposed to plugging our vocational fleet into a strained grid that relies on fossil-fueled peaker plants.

Our goal is to create a closed-loop system: we want to generate and dispense both clean electricity and hydrogen fuel right at our Fresno processing facility, utilizing the massive volumes of incoming agricultural residuals and high-hazard forest wastes that we handle daily. We are already supporting active demonstration efforts under **CEC Grant ARV-23-001** to prove out containerized waste-to-energy technologies at a scale suitable for commercial fueling hubs. To make this vision a widespread reality, the overarching Investment Plan must provide an equitable pathway for developers.

### **Targeted Modifications for the Final Investment Plan**

To build a resilient transportation framework that resolves our regional waste and air quality crises, West Coast Waste recommends the following actions:

- **Direct Capital into Biomass-to-Electricity:** Allocate a dedicated, meaningful portion of the annual \$95 million budget toward advanced, clean biomass-to-electricity projects capable of powering localized EV charging facilities completely off-grid.

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- **Repurpose Unspent Hydrogen Funding:** Utilize unspent hydrogen infrastructure funds alongside a significant slice of the annual \$95 million CTP fund to accelerate the commercial deployment of direct biomass-to-hydrogen conversion technologies.
- **Eliminate Scoring Obstacles for On-Site Generation:** Restructure the evaluation metrics used in upcoming Grant Funding Opportunities (GFOs) to give preference to projects that offset or eliminate grid energy requirements with on-site renewables energy and those that provide load management to reduce peak drains on the grid without penalizing their cost per port and cost per kw delivered scoring from the incorporation of on-site renewable power and battery energy storage systems.

Thank you for your consideration of our perspective from 20 years on the frontlines of Central Valley resource management.

Very truly yours,

**WEST COAST WASTE INC.**

A handwritten signature in black ink, appearing to read 'Dennis Balakian', with a stylized flourish extending to the right.

Dennis Balakian, President