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Docket Number:	26-ALT-01
Project Title:	2026-2027 Investment Plan Update for the Clean Transportation Program
TN #:	270200
Document Title:	CEC Appeal Letter, Clean Transportation
Description:	CEC Appeal Letter, Clean Transportation program, from All Power Labs
Filer:	James M. Mason
Organization:	All Power Labs
Submitter Role:	Applicant
Submission Date:	5/22/2026 4:34:57 PM
Docketed Date:	5/22/2026



Docket Number: 26-ALT-01

Project Title: 2026-2027 Investment Plan Update for the Clean Transportation Program

TN #: [Leave Blank]

Document Title: All Power Labs Comments - ALL Power Labs comments on CEC 2026-2027 Clean Transportation Investment Plan

Description: N/A

Filer: System

Organization: All Power Labs

Submitter Role: Public

Submission Date: May 19, 2026

Docketed Date: May 19, 2026

Comment Received From: All Power Labs (APL)

Submitted On: May 19, 2026

Docket Number: 26-ALT-01

Subject: All Power Labs Public Comments on the Draft 2026-2027 Clean Transportation Investment Plan

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May 19, 2026

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California Energy Commission

Docket 26-ALT-01

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RE: Public Comment: Draft 2026-2027 Investment Plan Update for the Clean Transportation Program

All Power Labs (APL) is pleased to submit our formal comments regarding the California Energy Commission's (CEC) Draft 2026-2027 Clean Transportation Investment Plan. As a Berkeley-based developer and manufacturer of world-class, modular biomass gasification technology, APL designs and deploys game-changing, decentralized energy equipment. Our commercial systems convert localized biomass waste streams into



reliable on-site electricity, high-purity syngas optimized for hydrogen extraction, and high-value biochar.

The Critical Flaw: Funding the Pump While Starving the Source

The current draft of the Investment Plan is hyper-focused on the retail dispensing side of the clean transport equation—specifically, pouring capital into EV charging plugs and hydrogen fuel dispensers. However, the plan completely ignores the generation side, providing zero funding for the localized production of the electricity or hydrogen needed to feed these dispensers.

This presents a massive logistical hurdle. Megawatt-scale EV charging stations and hydrogen production hubs require enormous volumes of energy. If the CEC does not fund integrated, distributed generation alongside these hubs, the deployment will default entirely to the utility grid.

California's grid is already visibly strained, and the explosive growth of massive, power-hungry data centers is compounding this pressure daily. Expecting an overtaxed grid to absorb thousands of new high-power transport connections without localized, baseload renewable support is a recipe for system instability and high energy costs.

Biomass Waste: The Unlocked Baseload Power Supply

While the grid struggles, California is sitting on an untapped ocean of clean renewable power: biomass waste. The state's agricultural sector is facing an unprecedented waste disposal crisis because recent, comprehensive bans on open-field burning have eliminated traditional disposal options. Concurrently, high-hazard forest zones are choked with fuel that lacks commercial outlets—woody material that could easily be converted into local power and hydrogen. This crisis exists because the majority of California's legacy centralized biomass power plants have been permanently shut down. The solution is not to build more centralized plants, but to deploy proven, modular, and highly efficient distributed technologies that process this waste right where it lands. Advanced thermochemical systems are fully ready for commercial application, and direct biomass-to-hydrogen technologies are primed to scale.

With the current pivot in Federal energy policy signaling a sharp decline in DOE-led renewable infrastructure funding, California cannot wait for federal assistance. The CEC must step up and assert its leadership by funding the bridge between waste management and transportation fuel.

APL Technology: Proven, Modular, and Station-Ready



At All Power Labs, we have developed a containerized, fully deployable biomass-fueled power unit specifically engineered for co-location at public and private fueling stations. This system directly resolves the dispensing crisis by generating on-site electricity for EV fast-chargers or producing a highly refined, low-nitrogen syngas uniquely suited for localized hydrogen extraction.

This revolutionary deployment is currently moving forward under **CEC Grant ARV-23-001**:

Phase 1 Success: APL has successfully completed Phase 1 of this grant, building and proving out a prototype system installed at an active biomass processing facility in Fresno. The testing verified the equipment's ability to seamlessly turn raw waste into clean, transport-grade energy.

Phase 2 Ready: Phase 2 of this project will be presented to the Commission for approval shortly. This phase launches our first commercial-scale, factory-built containerized system, demonstrating a turnkey solution for gas stations and fleet depots looking to cut the utility cord.

Actionable Recommendations for the CEC

To maximize the impact of the Clean Transportation Program and ensure real energy resilience, APL urges the Commission to adopt the following measures:

1. **Deploy Capital for Biomass-to-Electricity Infrastructure:** Direct a significant portion of the annual \$95 million budget toward advanced, clean biomass-to-electricity projects. Funding on-site, waste-to-energy conversion at charging hubs will relieve grid stress and lower operating costs.
2. **Redirect Idle Hydrogen Funds to Local Biomass Conversion:** Capture unspent hydrogen fueling infrastructure allocations and combine them with a meaningful slice of the annual \$95 million fund to commercialize direct biomass-to-hydrogen production systems.
3. **Fix the Clean Energy Penalty in Future GFOs:** Overhaul the scoring architecture in upcoming Grant Funding Opportunities (GFOs). A prime example of what not to do was seen in the recent Depot Charging solicitation. While it technically allowed distributed renewables up to 25% of the grant, the scoring rubrics heavily penalized applicants who included them. By prioritizing the lowest



"cost per port" or "kW delivered," the upfront capital required for integrated clean generation made these projects uncompetitive against grid-tied options. The CEC must eliminate this flaw so that developers adding localized, renewable power are rewarded rather than locked out.

The technology to solve California's transportation and agricultural waste challenges simultaneously is built, tested, and ready. We look forward to seeing the CEC align its funding priorities to deploy it.

Sincerely,

Jim Mason

President

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