

DOCKETED

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Comments on the Revised 2016/2017 ARFVTP Investment Plan, Docket No. 15-ALT-01

Additional submitted attachment is included below.



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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January 29, 2016

Commissioner Janea A. Scott
California Energy Commission
Dockets Unit, MS-4
Re: Docket No. 15-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

Via Email: docket@energy.ca.gov

Subject: Comments on the Revised 2016/2017 ARFVTP Investment Plan, Docket No. 15-ALT-01

Dear Commissioner Scott:

I appreciate the opportunity to provide comments on the Revised 2016/2017 AB 118 Investment Plan. CalRecycle supports the edit made to the Revised Investment Plan to clarify that pre-landfill biomethane production will be prioritized in solicitations issued under the Plan.

Prioritizing pre-landfill biomethane is critical in light of the draft Short-Lived Climate Pollutant Plan, developed by the Air Resources Board, which calls for a 90 percent reduction in landfill disposal of organics by 2025. Actions undertaken in response to the Short-Lived Climate Pollutant Plan are certain to dramatically reduce the volume of methane generated and emitted by landfills in California. This reduction in landfill methane is needed to reduce the impacts of climate change. Such reductions will increase the risk that an investment in a fuel production facility at a landfill will become a stranded asset. Thus, effective prioritization of pre-landfill biomethane production will help ensure that AB 118 funding gets invested in non-landfill projects which are likely to produce transportation fuel for many years with limited risk of becoming a stranded asset.

In summary, the Revised 2016/2017 Investment Plan offers an excellent opportunity for continued progress transitioning California to low carbon transportation fuels, and CalRecycle looks forward to ongoing collaboration with the CEC in support of the AB118 program. If you have any questions, please do not hesitate to contact me directly at (916) 341-6311.



Sincerely,



Howard Levenson, Ph.D.

Deputy Director, Materials Management and Local Assistance Division

Member, Alternative and Renewable Fuel and Vehicle Technology Program

Investment Plan Advisory Committee

Cc: Scott Smithline, Director, CalRecycle
Ken DeRosa, Chief Deputy Director, CalRecycle
Christine Hironaka, CalRecycle
Brenda Smyth, CalRecycle