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Additional submitted attachment is included below.



February 23, 2018

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California Energy Commission
Docket Unit, MS-4
Re: Docket No. 16-OIR-05
1516 Ninth Street
Sacramento, CA 95814-5512

Docket #: 16-OIR-05
Comments on the Draft Staff Paper:
Revised Assembly Bill 1110 Implementation Proposal for Power Source Disclosure

CBEA appreciates this opportunity to comment on the January 2018, *Revised Assembly Bill 1110 Implementation Proposal for Power Source Disclosure*. Our comments focus on the treatment of biomass energy generation and biogenic carbon emissions.

The California Biomass Energy Alliance is the trade organization of California's biomass energy industry. CBEA was created more than 20 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 greenhouse gas emissions-reduction requirements.

The *Revised Assembly Bill 1110 Implementation Proposal for Power Source Disclosure* (Revised Proposal) provides for certain exclusions from a retail provider's greenhouse-gas intensity determination, including for biogenic greenhouse gases emitted by bioenergy generation. The Revised Proposal notes that doing so is consistent with the California Cap-and-Trade program, and IPCC reporting guidelines (see Revised Proposal, pg. 8).

The Revised Proposal states, on page 9: "Staff proposes that biogenic CO₂ associated with an electricity offering be disclosed on the power content label separately in a footnote, but not be used in calculating the electricity offerings' overall GHG emissions intensity." The CBEA supports this treatment, but we are concerned about the wording that will be used in the footnote. We propose the following wording for the footnote, which should be included in the next revision of the Revised Proposal:

* xx million tons per year of biogenic CO₂ emissions are emitted by the bioenergy facilities in (name of provider)'s energy supply, but these emissions are offset by the avoided emissions associated with the alternative disposal of the fuel.

The Revised Proposal continues, on page 9: “CH₄ and N₂O emissions associated with biogenic fuels will still be included in an electric service product’s GHG emissions intensity.” This treatment is appropriate for N₂O emissions, but it is not appropriate for biogenic CH₄ emissions. On the contrary, for the same reasons that biogenic CO₂ emissions should not be included in an electric service product’s GHG emissions intensity, biogenic CH₄ emissions should not be included in an electric service product’s GHG emissions intensity.

In fact, the case for not including the biogenic CH₄ emissions in the GHG emissions intensity is even more compelling than the case for not including the biogenic CO₂ emissions. The biogenic CO₂ emissions can be fully offset, but no better. The biogenic CH₄ emissions can be offset several times over by avoiding much greater emissions of biogenic CH₄ emissions that would occur if the fuel were open burned in piles, buried in a landfill, or left to rot as dead and overgrowth material in the forest.

Emissions of biogenic CH₄ from biomass power plants are de minimis, and so do not make a significant contribution to a retail provider’s product’s GHG emissions intensity. Nevertheless, the fact is that bioenergy production actually reduces net biogenic CH₄ emissions compared to the disposal alternatives, for the biomass resources that are used for energy production. Like in the case of biogenic CO₂ emissions, where the offset emissions will be attributed “to the Agriculture, Forestry, and Other Land-Use Sector (Revised Proposal, pg.8),” offsets of biogenic CH₄ emissions will also be attributed to the Agriculture, Forestry, and Other Land-Use Sectors. For purposes of determining the GHG intensity of a retail provider’s product offerings, all biogenic carbon emissions should be excluded, including CO₂ and CH₄.

Thank you for your kind attention and consideration of these comments.

Sincerely,
California Biomass Energy Alliance



Julee Malinowski Ball, Executive Director