

## DOCKETED

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*Comment Received From: Howard Levenson*

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**Comments on the Draft 2018/2019 ARFVTP Investment Plan Update, Docket No. 17-ALT-01**

*Additional submitted attachment is included below.*



## DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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November 17, 2017

Commissioner Janea A. Scott  
California Energy Commission  
Docket Unit, MS-4  
Re: Docket No. 17-ALT-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**Subject:** Comments on the Draft 2018/2019 ARFVTP Investment Plan Update, Docket No. 17-ALT-01

Dear Commissioner Scott:

Thank you for your leadership and your staff's thoughtful work in preparing the 2018/2019 draft Investment Plan. CalRecycle commends the California Energy Commission (CEC) for continuing to take a balanced approach in developing the Investment Plan, including the proposal to increase funding for Low-Carbon Fuel Production and Supply. This is likely to leverage private sector investments in biomethane production from anaerobic digestion of organic municipal solid waste.

CalRecycle supports the proposal to consider a solicitation for vertical integration of biomethane production and distribution facilities with vehicle fleets. Combining funding from several ARFVTP categories (including Low-Carbon Fuel Production and Supply, Natural Gas Fueling Infrastructure, Natural Gas Vehicles, and Advanced Freight and Fleet Technologies categories) is an innovative approach to link fuel production with demand, strengthening the financial viability of projects. CalRecycle appreciates the CEC's acknowledgement that biomethane offers several advantages over fossil natural gas, including the potential for reduced methane leakage and a significantly lower carbon intensity, and supports the CEC's proposal to prioritize funding renewable natural gas projects from these categories.



CalRecycle appreciates the opportunity to collaborate with the CEC on the AB 118 program and is committed to assisting in both the development and implementation of 2018/2019 Investment Plan. 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  
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