

DOCKETED

Docket Number:	17-HYD-01
Project Title:	Renewable Hydrogen Transportation Fuel Production
TN #:	220535
Document Title:	Comments on the Draft Solicitation Concepts for Renewable Hydrogen Transportation Fuel Production Facilities & Systems, Docket N
Description:	N/A
Filer:	System
Organization:	DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY
Submitter Role:	Public Agency
Submission Date:	8/3/2017 1:11:37 PM
Docketed Date:	8/3/2017

Comment Received From: Howard Levenson

Submitted On: 8/3/2017

Docket Number: 17-HYD-01

**Comments on the Draft Solicitation Concepts for Renewable Hydrogen
Transportation Fuel Production Facilities & Systems, Docket No. 17-HYD-01**

Additional submitted attachment is included below.



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

August 3, 2017

John Kato, Deputy Director
Fuels and Transportation Division
California Energy Commission
Dockets Office, MS-4
Docket No. 17-HYD-01
1516 Ninth Street
Sacramento, CA 95814

Via Email: docket@energy.ca.gov

Subject: Comments on the Draft Solicitation Concepts for Renewable Hydrogen Transportation Fuel Production Facilities & Systems, Docket No. 17-HYD-01

John
Dear Mr. Kato:

The California Department of Resources Recycling and Recovery (CalRecycle) appreciates the opportunity to provide comments for your consideration on the Draft Solicitation Concepts for Renewable Hydrogen Transportation Fuel Production Facilities & Systems (Draft Solicitation Concepts).

CalRecycle notes that Section 6, "Eligible Feedstocks and Renewable Electricity Sources," includes landfill gas as both an eligible feedstock and an eligible renewable electricity source for hydrogen production. Such funding for landfill gas projects could incentivize continued disposal of organic materials in landfills. As you know, CalRecycle has raised concerns about expending the limited pool of AB 118 funding for landfill gas projects in previous ARFVTP Investment Plans and appreciates that the California Energy Commission (CEC) excluded landfill gas projects from Biofuels Production and Supply solicitations in the 2017/2018 Investment Plan. To be consistent with this, CalRecycle urges you to reconsider this aspect of the new solicitation and exclude projects that use landfill gas from solicitations in all ARFVTP categories, instead focusing on projects utilizing pre-landfill feedstocks, consistent with the Biofuel Production and Supply category.

As noted in the 2017/2018 Investment Plan, disposal of organic materials in landfills is at odds with the goals set forth in Senate Bill 1383 (Lara, Chapter 395, Statutes of 2016) to reduce statewide disposal of organic waste from 2014 levels by 50 percent by 2020 and 75 percent by



2025. Allowing hydrogen fuel projects that use landfill gas as feedstock, or as a source for renewable electricity, to compete in this solicitation is inconsistent with SB 1383 and the stated goals in the Biofuel Production and Supply section of the 2017/2018 Investment Plan because it incentivizes disposal of organic materials in landfills.

In summary, we request that you reconsider and remove landfill gas from the Draft Solicitation Concepts as a clear signal that AB 118 funding will not be used to incentivize landfill gas projects. CalRecycle looks forward to ongoing collaboration with the CEC in support of the AB 118 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: Laurie Ten Hope, CEC
Elizabeth John, CEC
Jean Baronas, CEC
Brenda Smyth, CalRecycle
Clark Williams, CalRecycle