

DOCKETED

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DPW Comments on 2017 IEPR

Additional submitted attachment is included below.



MARK PESTRELLA, Director

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DEPARTMENT OF PUBLIC WORKS

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July 13, 2017

IN REPLY PLEASE
REFER TO FILE: **EP-4**

Mr. Robert Weisenmiller, Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5504

Dear Mr. Weisenmiller:

COMMENTS ON THE 2017 INTEGRATED ENERGY POLICY REPORT ON RENEWABLE GAS – JOINT AGENCY WORKSHOP ON RENEWABLE GAS

The Los Angeles County Department of Public Works (Public Works) would like to express our appreciation to the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), and the California Air Resources Board (ARB) for providing the opportunity to comment on the Joint Agency Workshop on Renewable Gas held on June 27, 2017. Public Works is very supportive of the efforts of CEC, CPUC, and ARB to promote the development and use of renewable gas, including biomethane and biogas. Public Works would appreciate the CEC, CPUC, and ARB's consideration of the following comments as part of the 2017 Integrated Energy Policy Report on Renewable Gas:

- The requirements of SB 1383 include that "state agencies shall consider and, as appropriate, adopt policies and incentives to significantly increase the sustainable production and use of renewable gas, including biomethane and biogas." Public Works recommends CPUC develop and adopt a renewable gas standard that requires gas utilities to procure/distribute a minimum percentage of renewable gas. This standard is needed to provide market certainty for private industry to make the major investment to produce renewable gas.
- State policies and incentive programs should be revised so that they are technology neutral and performance based, and do not limit production to a single technology, so that they promote a market which furthers the beneficial uses and cost-effectiveness of renewable gas. Consideration should be made to revise the following policies and programs:

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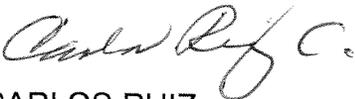
- According to California Health and Safety Code, Section 25420, only biogas produced from anaerobic digestion can be put into the pipeline. The Health and Safety Code should be amended to define "biogas" as the gas from anaerobic digestion of organic materials or the noncombustion thermal conversion of eligible biomass feedstock consistent with Section 40106 of the Public Resources Code.
 - All Greenhouse Gas Reduction Fund and Organics Diversion funding allocation should be based on performance criteria or greenhouse gas reductions rather than on specific technologies. There should not be any funding restrictions for biomass conversion facilities that can significantly reduce greenhouse gas emissions.
- Consider accelerating the reconsideration of pipeline biogas standards so that they are not cost-prohibitive to the producers of renewable biogas.

We respectfully request that CEC, CPUC, and ARB address these questions, concerns, and recommendations in the draft 2017 Integrated Energy Policy Report.

If you have any questions, please contact Mr. Patrick Holland at (626) 458-3592, Monday through Thursday, 7 a.m. to 5:30 p.m.

Very truly yours,

MARK PESTRELLA
Director of Public Works



CARLOS RUIZ
Principal Engineer
Environmental Programs Division

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