

DOCKETED

Docket Number:	17-IEPR-10
Project Title:	Renewable Gas
TN #:	220211
Document Title:	Comments on the 2017 IEPR Regarding the Development and Use of Renewable Gas as an Electricity Source and Transportation Fuel to
Description:	Comments by Bay Area Air Quality Management District
Filer:	System
Organization:	Bay Area Air Quality Management District
Submitter Role:	Public Agency
Submission Date:	7/14/2017 4:16:23 PM
Docketed Date:	7/14/2017

Comment Received From: Damian Breen

Submitted On: 7/14/2017

Docket Number: 17-IEPR-10

Comments on the 2017 IEPR Regarding the Development and Use of Renewable Gas as an Electricity Source and Transportation Fuel to Reduce Short-Lived Climate Pollutants

Additional submitted attachment is included below.



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

ALAMEDA COUNTY

Tom Bates
Scott Haggerty
Rebecca Kaplan
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
(Secretary)
Karen Mitchoff
Mark Ross

MARIN COUNTY

Katie Rice

NAPA COUNTY

Brad Wagenknecht

SAN FRANCISCO COUNTY

John Avalos
Edwin M. Lee
Eric Mar
(Chair)

SAN MATEO COUNTY

David J. Canepa
Carole Groom
Warren Slocum

SANTA CLARA COUNTY

Cindy Chavez
Liz Kniss
(Vice-Chair)
Jan Pepper
Rod G. Sinks

SOLANO COUNTY

James Spering
Osby Davis

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

July 14, 2017

The Honorable Robert Weisenmiller, Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Comments on the 2017 Integrated Energy Policy Report (IEPR) Regarding the Development and Use of Renewable Gas as an Electricity Source and Transportation Fuel to Reduce Short-Lived Climate Pollutants

Dear Chair Weisenmiller:

On behalf of the Bay Area Air Quality Management District (Air District), I am writing to express our support of the California Energy Commission's (CEC) effort to develop and use renewable gas as an electricity source and transportation fuel to reduce short-lived climate pollutants (SLCPs). This effort is consistent with the goals outlined in the Air District's recently adopted 2017 *Clean Air Plan*, a multi-pollutant plan that provides a roadmap for the Air District's efforts to reduce emissions of air pollutants and greenhouse gases (GHGs) in the Bay Area.

The impacts of climate change are clearly felt today in the Bay Area and California. Climate change will have profound impacts on the natural and the man-made systems that sustain us, affecting the environment, public health, and the economy at the local, regional and global scales. CEC's effort in facilitating the use of renewable natural gas is consistent with the Air District's key control strategies such as reducing emissions of "super-GHGs" including methane, and decarbonizing the energy system by making the electricity supply carbon-free.

In addition, the Bay Area is home to over 5.7 million on-road vehicles that are responsible for approximately 40% of the criteria pollutants and 36% of the greenhouse gases emitted in the region. CEC's effort to support the use of renewable gas as a transportation fuel in combination with the technological advancement in ultra-Low NOx natural gas engines will help Bay Area fleet operators to significantly reduce emissions of both criteria air pollutants and GHGs, and ultimately help the Bay Area attain its clean air and GHG emissions reduction goal. In addition, many of these Low NOx engines will displace the use of heavy-duty diesel engines, reducing the impacts of toxic diesel particulate matter in disadvantaged communities.

The Air District has extensive experience helping the region's transit agencies in their transition to clean, alternative fuel vehicles and has awarded and managed over \$400 million in incentives for clean transportation projects since 1992. Based on our experience, we encourage the CEC to continue to support

July 14, 2017

a broad portfolio of clean transportation-fuel options, including renewable natural gas, electricity, and hydrogen, to help our region and the State to achieve our shared climate protection and air quality improvement goals.

Recognizing the climate and air quality benefits as well as the financial and technical challenges associated CEC's effort, we look forward to continuing working with CEC and other stakeholders on the development and use of renewable gas as an electricity source and transportation fuel. With increased availability of this fuel going forward, the Air District will be able to leverage \$20 to \$40 million of annual funding for projects that use renewable natural gas to reduce both GHG and criteria air pollutant emissions in the Bay Area and California.

If you have any questions regarding this letter please contact Damian Breen, Deputy Air Pollution Control Officer at (415) 749-5041.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Broadbent", with a large, sweeping flourish underneath.

Jack P. Broadbent
Executive Officer/APCO