



August 29, 2011

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

10-ALT-01

DATE

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SUBJECT: DOCKET NO. 10-ALT-1

Thank you for the opportunity to comment on the 2011-12 Investment Plan for the Alternative Fuel and Renewable Fuel and Vehicle Technology Program. I am writing on behalf of the Bay Area Biosolids to Energy Project (BAB2E), a coalition of 16 wastewater treatment agencies in the Bay Area which have formed a Coalition to create a local sustainable solution to biosolids management by utilizing the remaining energy in biosolids after treatment. Currently, most of the participating agencies haul biosolids long distances for land application and/or alternative daily cover at landfills. However, local governments are restricting this use and it is not sustainable in the long-term. Therefore, the BAB2E is working with technology companies that can convert biosolids to energy and/or fuel.

The 2011-12 Investment Plan discusses hydrogen as an alternative fuel source and proposes an \$8.5 million investment hydrogen fueling infrastructure. We would suggest the Energy Commission consider augmenting the hydrogen funding allocation to also include funding for hydrogen production from renewable resources, such as biosolids. Such an allocation would help to increase hydrogen production from renewable resources and would ensure that the California Air Resources Board (CARB) is able to enforce the legal mandate that hydrogen used for transportation fuel be at least 33.3% from renewable sources. If an augmentation for production is not possible, then the CEC should consider how the funds dedicated to fueling infrastructure could be used for on-site production using renewable sources, such as biosolids.

The 2011-12 Investment plan also proposes \$29 million investment in biofuels, including funding for waste-based resources. The Investment Plan identifies a number of waste-based sources for fuel. As investment decisions are considered, the BAB2E would encourage the Energy Commission to consider biosolids from publicly owned wastewater treatment plants as a source for biofuel. Again, thank you for the opportunity to comment. The member agencies of the BAB2E project look forward to working with the CEC on implementation of your 2011-12 Investment Plan.

Sincerely,

Caroline Quinn
Director of Engineering Services, DDSD
Project Manager for the BAB2E Coalition

CLQ:cb

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