

**DOCKETED**

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**California Biomass Energy Alliance Comments on SB 100 Technical  
Workshop 11182019**

*Additional submitted attachment is included below.*



December 2, 2019

California Energy Commission  
Docket Office, MS-4  
[docket@energy.ca.gov](mailto:docket@energy.ca.gov)  
Re: Docket No. 19-SB-100  
1516 Ninth Street  
Sacramento, CA 95814

**Re: California Biomass Energy Alliance Comments on the California Energy Commission Docket No. 19-SB-100 SB 100 Technical Workshop on November 18, 2019**

Dear Commissioners:

The California Biomass Energy Alliance (CBEA) is pleased to submit the following comments on the November 18, 2019, SB 100 joint agency workshop evaluating California's renewable energy and zero-carbon resources supply to get the state to its 2045 goals. CBEA supported SB 100 and supports this process. CBEA wants to emphasize that while the utilities are easily meeting their 2020 renewable mandates, getting to the 2045 targets will take a considerably more concerted effort. Our comments address two of the presentations that were made at the November 18 workshop, the CARB presentation on defining eligible carbon-free resources for compliance with SB 100 targets, and the CPUC presentation on the 2019 Reference System Portfolio (RSP) developed for the Integrated Resource Planning proceeding.

### **Eligible Resources**

At the November 18, 2019, interagency SB 100 workshop, CARB staff gave a report on options for defining eligible carbon-free electricity-generating resources under SB 100. CARB announced that they would be considering two scenarios in their analysis of a carbon-free future. The first scenario is based on conventional definitions of carbon-free resources, including all eligible RPS resources, as well as other carbon-free resources like large hydro and nuclear. The second scenario is entitled "no combustion," and differs from the first scenario essentially by removing biomass and biogas from the list of eligible carbon-free resources.

CBEA strongly objects to the inclusion of Resource Scenario 2 in the study plan. It runs counter to California statute, which defines biomass and biogas as RPS-eligible resources, and it lacks any legitimate basis in science or policy. Moreover, since a substantial fraction of the biomass fuel used in California would otherwise be open burned in the absence of beneficial use of the

material as fuel, excluding biomass from the list of carbon-free fuels would not only **not** reduce the amount of combustion of biomass materials taking place in California, it would substitute dirty open burning of these materials for clean combustion in a controlled boiler with post-combustion emission controls. That runs diametrically counter to state policy goals.

There is absolutely no scientific basis for excluding energy resources that utilize combustion from the list of eligible carbon-free resources for SB 100 compliance purposes. The question should be whether a given energy source is carbon-free, not whether combustion has been used in the course of its generation. Indeed, the idea that combustion is somehow unacceptable should be characterized more as a matter of religious belief than one promoting the achievement of California's climate goals. Combustion is a tool, like any other energy conversion process. There is no reason to vilify it.

If any changes are to be made to the carbon-free status of any eligible RPS resource as defined by statute, and as included in Resource Scenario 1, then a sound scientific case first needs to be developed, proffered and vetted, and proper process for changing the statute needs to be followed. We note that a series of authoritative studies has shown that biomass and biogas energy generation using waste and residue resources are at least carbon neutral, and in most cases carbon negative.<sup>1</sup> There has been no formal effort that we are aware of to challenge the eligibility of biomass or biogas for the RPS program in California, either on the basis of carbon neutrality, or any other basis. Resource Scenario 2 is arbitrary and misplaced, and spending any analytical effort on it in furtherance of meeting the requirements of SB 100 would not be useful or productive.

### **Projected New Resource Buildout**

CPUC staff delivered a report to the November 18, 2019, interagency SB 100 workshop, on the proposed RSP that is under development in the IRP proceeding at the Commission. We are concerned that the new resources buildout proposed in the RSP completely lacks diversity, as it is based almost exclusively on a single renewable resource, solar PV, supplemented by enough energy storage capacity to balance and operate the system. California Public Utilities Code §454.51 directs the process to identify a diverse and balanced portfolio of resources. The PUC's RSP is anything but diverse or balanced. It is time to value attributes other than just energy, like reliability and load-following capability, as well as environmental and rural-development benefits in the IRP process. The identification of a robust energy system requires no less.

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<sup>1</sup> United States Environmental Protection Agency, Office of Air and Radiation Office of Atmospheric Programs, Climate Change Division, Framework for Assessing Biogenic CO<sub>2</sub> Emissions from Stationary Sources, EPA publication, November 2014, Gray, E., et. al., *Clean and Diversified Energy Initiative Biomass Task Force Report*, Report of the Western Governors' Association, Jan. 2006, USDA Forest Service Pacific Southwest Research Station, *Biomass to Energy: Forest Management for Wildfire Reduction, Energy Production, and Other Benefits*, CEC report no. CEC-500-2009-080, January 2010, Morris, G., *Bioenergy and Greenhouse Gases*, Report of the Pacific Institute, May 15, 2008,

CBEA is also concerned that the PUC's RSP assumes that all currently operating RPS generators will continue to operate throughout the timeframe of the projection (through 2030), without considering the implications of this assumption. In fact, many existing RPS generators are operating under contracts that will expire well before 2030, and if the RSP is based on these generators continuing to operate through 2030, then the plan should include considerations for re-contracting with facilities with expiring contracts, including in appropriate circumstances with provisions for refurbishing and repowering.

Sincerely,  
California Biomass Energy Alliance

A handwritten signature in black ink, reading "Julee Malinowski Ball". The signature is written in a cursive style with a large initial "J".

Julee Malinowski Ball  
Executive Director