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## consideration of biomethane and methane option

The report indicates modeling limitations and lack of cost data precluded a range of zero-carbon firm resources from being included as candidate resources. This is an artificial constraint as zero carbon is not a requirement to achieve carbon reductions to achieve State mandated temperature reductions of 2 degrees. Secondly, if biomethane is used with low cost methane with carbon capture and storage as published by Energy Futures Initiative/Stanford University then a much lower cost option exists. The development of a 3100 F hydrogen turbine by Mitsubishi with availability by 2030 would provide 6 to 8 cents/kWh with CCS. This is a highly flawed and incomplete report.