

**DOCKETED**

<b>Docket Number:</b>	16-OIR-06
<b>Project Title:</b>	Senate Bill 350 Disadvantaged Community Advisory Group
<b>TN #:</b>	235963
<b>Document Title:</b>	DACAG Member Roger Lin Comments - on Application 19-02-015 - of SoCalGas and SDG&E for Renewable Natural Gas
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	DACAG Member Roger Lin
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/16/2020 1:46:16 PM
<b>Docketed Date:</b>	12/16/2020

*Comment Received From: DACAG Member Roger Lin*  
*Submitted On: 12/16/2020*  
*Docket Number: 16-OIR-06*

**on Application 19-02-015 - of SoCalGas and SDG&E for Renewable Natural Gas**

*Additional submitted attachment is included below.*

The California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

VIA EMAIL

December 2, 2020

**Re: Application 19-02-015: Application of Southern California Gas Company (U 904 G) and San Diego Gas & Electric Company (U 902 G) for Renewable Natural Gas Tariff.**

To the Californian Public Utilities Commissioners,

The Disadvantaged Community Advisory Group (DACAG) was established pursuant to SB 350 to “review and provide advice on programs proposed to achieve clean energy and pollution reduction and determine whether those proposed programs will be effective and useful in disadvantaged communities.” Given its mandate, the DACAG is well situated to assess the extent to which Application 19-02-015 and the corresponding proposed decision addresses vulnerabilities and opportunities in disadvantaged communities.

The DACAG is opposed to sourcing energy in ways that exacerbate environmental degradation in disadvantaged communities and is opposed to programs and policies that induce or expand environmental degradation in disadvantaged communities. Large Confined Animal Feeding Operations (CAFOs) which produce gas through conversion of wet manure into biomethane contribute to air pollution, groundwater pollution, and produce odor and dust and CAFOs – in general and those that convert wet manure into biomethane – are primarily located in the San Joaquin Valley, an area disproportionately impacted by polluted air, contaminated water, choking dust, and odors that keep kids from playing outside.

Accordingly, the DACAG recommends that the CPUC modify the proposed decision on A19-02-015 to eliminate gas sourced from confined animal feeding operations from the voluntary tariff program or, at the very least, require the participating utilities to disclose the environmental and environmental justice harms that biogas sourced from CAFOs induces, expands, and sustains in marketing materials for participation in the voluntary tariff program.

The DACAG is particularly concerned about programs and policies that are promoted as climate solutions despite their role in exacerbating or sustaining local environmental burdens. This voluntary tariff will fall squarely in that category unless the CPUC excludes biomethane sourced from CAFOs from the program or, at a minimum, requires that consumers know of the environmental harms associated with the voluntary tariff prior to opting in to the program.

Sincerely,

The Disadvantaged Communities Advisory Group

Stan Greschner, Chair  
Angela Islas, Vice Chair  
Phoebe Seaton, Secretary  
Jana Ganion  
Adriano Martinez  
Andres Ramirez  
Fred L. Beihn  
Stephanie Chen  
Roger Lin  
Tyrone Roderick Williams  
Román Partida-López