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**CASA Comments on the June 2 CEC Staff presentation on SB 100,
Docket Number 21-SIT-01**

Additional submitted attachment is included below.



June 22, 2021

California Energy Commission
Docket Office
1516 Ninth Street
Sacramento, CA 95814

Docket # 19-SB-100

Transmitted online via: <https://efiling.energy.ca.gov/EComment/Ecomment.aspx?docketnumber=21-SIT-01>

Re: California Association of Sanitation Agencies Comments on the CEC Staff presentation on SB 100 on June 2, 2021: Docket Number 21-SIT-01

Dear Commissioners and Members:

The California Association of Sanitation Agencies (CASA) appreciates this opportunity to comment on the staff presentation delivered June 2, on next steps to plan for SB 100 resources build. CASA strongly supports the objectives of SB 100 and can be a collaborative partner with the state in achieving them. We are very concerned, however, with CEC's omission of the role that renewable biogas must play and the reality that its production will increase as other climate mitigation policies are implemented.

CASA is an association of local agencies, engaged in advancing the recycling of wastewater into usable water, as well as the generation and use of renewable energy, biosolids, and other valuable resources. Through these efforts we help create a clean and sustainable environment for Californians. Our members are focused on helping the State achieve its 2030 mandates and goals for greenhouse gas emissions reductions, which include:

- Reducing short-lived climate pollutant (SLCP) emissions
- Effectively diverting organic waste from landfills
- Providing 60 percent of the State's energy needs from renewable sources
- Reducing carbon intensity of transportation fuel used in the State
- Increasing soil carbon and carbon sequestration under the Healthy Soils Initiative, Forest Carbon Plan, and Natural and Working Lands Climate Change Implementation Plan

Our comments address the importance of including renewable biogas and biomethane derived from anaerobic digestion in the resources considered for and implementation of SB 100. As regulations adopted under SB 1383 are implemented, significantly more renewable gas will be produced at publicly owned wastewater treatment plants (POTWs) through the co-digestion of wastewater residuals with organic waste diverted from landfills. Co-digestion is a proven approach of economically producing renewable energy/fuel and producing a soil amendment to improve California's soil ecosystem.

More than 94% of the state's wastewater flow is treated through anaerobic digestion which generates biogas. As quantified in the [SWRCB's Co-Digestion Capacity Analysis](#) (released by the Governor's office in August 2020), POTWs can utilize their existing infrastructure in the form of anaerobic digestion to co-digest the divertible food waste across the state thereby removing a major source of fugitive methane from landfills (which account for ~20 percent of the state's methane). Utilizing co-digestion, California's POTWs can significantly increase biogas production to provide, among other benefits, a source of low carbon transportation fuel, onsite

renewable energy, or flexible generation renewable power under the BioMAT. The omission in the presentation of the reality of increased renewable biogas production severely jeopardizes our diversion mandates.

Additionally, the resulting biosolids can be utilized as a soil amendment to enrich the soil on which it is land applied as well as sequester carbon as called upon by the Governor's [Executive Order N-82-20](#), as well as the [Healthy Soils Initiative](#), [Natural and Working Lands Climate Change Implementation Plan](#), and [Forest Carbon Plan](#).

While CASA supports the collective goals of the state agencies, we have a growing concern that state agencies are not coordinating the development of their respective programs, resulting in conflicting objectives, thereby threatening the implementation of projects to divert organic waste and utilize the biogas produced. For example, while CARB strongly supports CalRecycle and the SWRCB in their efforts to implement SB 1383 regulations (influencing the production of biogas from co-digestion for use as a transportation fuel or for onsite power and heat production), CARB is also moving forward with Advanced Clean Truck and Fleet Rules to support electrification of government vehicles and eventually all passenger vehicles. While this promotes biogas to be converted to power, it disincentivizes the long-term opportunities for development of biogas into a low carbon fuel.

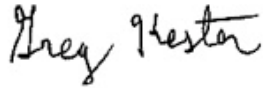
The omission of biogas contradicts the SB 100 presentation, which suggests California retain some level of gas capacity. The PATHWAYS model has projected that California will continue to rely on gas to some extent and utilities have stated they need access to gas for reliability purposes. To be consistent with SB 100 objectives, that gas should be biogas, biomethane, or hydrogen from Renewable Portfolio Standard eligible feedstocks.

In summary, CASA strongly recommends:

- Inclusion of biogas and biomethane in SB 100 PATHWAYS modeling.
- State level interagency coordination on the utilization of biogas and biomethane in alignment with and support of the goals and mandates firmly set in:
 - [2017 CARB Scoping Plan](#)
 - [2018 CEC Deep Carbonization in a High Renewables Future: Updated Results from the California PATHWAYS Model](#)
 - [2020 CalRecycle Organic Waste Methane Reduction Regulations](#)
- Utilizing the cost and supply information as provided in:
 - [2019 SWRCB Co-Digestion Capacity Analysis](#)
 - [2020 CEC The Challenge of Retail Gas in California's Low Carbon Future](#)
 - [2020 LLNL Getting to Neutral – Options for Negative Carbon Emissions in California](#)
 - CASA's 2015 estimate of statewide power, heat, and low carbon transportation fuel potential. Note the approach very conservatively estimated an additional 300 MWh per year of electricity or 1 million additional MMBtu per year of thermal energy or 27 million additional gasoline gallon equivalents or 24 million additional diesel gallon equivalents could be produced annually if existing anaerobic digester capacity were fully utilized.
- Supporting the Joint Agency Report's recommendation supporting research and innovation in clean energy technologies, including biogas/biomethane produced by POTW anaerobic digesters.

We appreciate the opportunity to comment on CEC's SB 100 presentation June 2 and the importance of incorporating biogas/biomethane utilization, and further appreciate your willingness to consider our recommendations. Please contact Greg Kester at gkester@casaweb.org (or 916-844-5262) and Sarah Deslauriers at sdeslauriers@carollo.com (or 925-705-6404) if you have any questions.

Sincerely,



Greg Kester
Director of Renewable Resources



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