

**DOCKETED**

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## **Consideration to Expand Eligibility for New Builds**

Pacific Steel Group is requesting the CEC consider expanding eligibility to new builds. We are in the process of permitting a steel recycling facility with innovative and industry changing technologies that will greatly reduce CO2 and other criteria pollutants. We meet all three of the objectives identified in AB209. 1) Provides significant benefits to the electrical grid, especially during net peak periods. PSG is located behind a generation pocket of significant wind and solar resources that are frequently curtailed due to transmission constraints. The PSG mill's location and 24/7 production profile would reduce renewable curtailments and improve renewable resource integration. The PSG mill is an interruptible process that intends to participate as a reliability demand response resource and can respond to time of use price signals. 2) Maximizes the reduction of the emissions of greenhouse gases. PSG mill will reduce greenhouse gas emissions with cutting edge process technology, powered by renewable energy and utilizing carbon capture. The project will further reduce transportation emissions as the only steel melting facility in the state of California, locating close to major sources of raw material scrap metal and close to major customers. 3) Reduces air pollution in under-resourced communities. Reinforcing steel is currently shipped to the state through the ports or long distances by truck – both create significant congestion and pollution in primarily under-resourced communities.

Thank you, Mark Olson