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CBEA Comments on Senate Bill 423 Emerging Renewable and Firm Zero Carbon Resources Workshop Presentations “ Docket 21 - ESR-01

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Additional submitted attachment is included below.



December 12, 2023

California Energy Commission
Docket Unit, MS-4
Docket No. 21-ESR-01
715 P Street,
Sacramento, CA 95814

**Re: CBEA Comments on Senate Bill 423 Emerging Renewable and Firm Zero
Carbon Resources Workshop Presentations – Docket 21-ESR-01**

Dear Commissioners:

The California Biomass Energy Alliance (CBEA) submits these comments on the SB 423 presentations made at the Commission's November 17 workshop. CBEA strongly supports the goals of SB 423 to promote the development of clean firm power, which is essential to meet California's climate goals while maintaining energy reliability. The presentations at the workshop provided helpful data, but omitted one key category of qualified RPS resources, biomass-to-electricity technologies.

CBEA urges the Commission to treat biomass as a zero-emission resource consistent with state policy and other state programs. Biomass does not incur emissions-related compliance obligations under CARB's Cap-and-Trade regulation. The 2021 SB 100 Report recognizes biomass as FZC resources. Biomass fully meets the definition of ZFR outlined in SB 423's legislative text, which makes no reference to restrictions on combustion technologies. The CEC could also look to its own Power Source Disclosure program, which uses emissions data from the California Air Resources Board's Mandatory Greenhouse Gas Reporting Regulation (MRR). The MRR requires separate reporting of biogenic and fossil carbon emissions. The biogenic emissions are excluded from generator-specific GHG emissions calculations. Further, biomass energy derived from wastes and residues is treated as carbon neutral or better by a variety of national and international greenhouse gas reduction programs, including by the Intergovernmental Panel on Climate Change. CEC does not have to do a lifecycle emissions analysis of these resources because it has been done already in a number of major studies and decided by the CARB.

CBEA members are many of the 23 solid-fuel biomass electric generating facilities in California, which reuse approximately 7.3 million tons of the state's solid wastes and residues annually and produces around 532 MW of electricity. Biomass generators produce reliable, baseload renewable power that can be scheduled to supply power when it is needed most. California's biomass power plants combust wood residues and byproducts to produce electricity — material whose disposal using conventional means creates serious adverse environmental impacts. Solid biomass fuels are materials that are diverted primarily from three kinds of disposal or disposition fates: open burning, landfill disposal, and accumulation as overgrowth material in the state's forests.

How biomass is viewed as an environmentally necessary technology is supported by new [research](#) from the University of California, Davis, published in the journal *Global Change Biology Bioenergy*, which examines the good and bad uses of biomass and the best pathways to meet California’s [goal](#) of reducing carbon dioxide emissions by 85% of 1990 levels by 2045. The researchers examined more than 400 papers written from 2005 to 2022 about biomass use in California and cataloged the effects on emissions. It finds that there are 34 pathways that either help reduce greenhouse gases or specific air pollutants, and 14 that achieve reductions in both categories. Conversely, 13 pathways — including wildfires, the open burning of biomass and other uses — increase harmful emissions. This research concluded:

“It’s best to use biomass for renewable energy or for generating electricity where combustion is controlled and carbon capture becomes a possibility — so it’s better for climate policy and for air quality relative to burning on site.”

It makes no sense that some renewable technologies were characterized at the workshop as “low emission” resources and are included, but biomass is not. Including biomass would make the SB 423 report much more accurate and helpful in guiding policies to promote clean firm renewables.

Sincerely,
California Biomass Energy Alliance (CBEA)

A handwritten signature in black ink, reading "Julee Malinowski-Ball". The signature is written in a cursive, flowing style.

Julee Malinowski-Ball, Executive Director