

DOCKETED	
Docket Number:	23-ERDD-02
Project Title:	Gas Research and Development Program
TN #:	261924
Document Title:	BioVind Inc. Comments - BioVind Comments on CEC Gas R&D Initiatives
Description:	N/A
Filer:	System
Organization:	BioVind Inc.
Submitter Role:	Public
Submission Date:	2/21/2025 3:26:58 PM
Docketed Date:	2/21/2025

Comment Received From: BioVind Inc.
Submitted On: 2/21/2025
Docket Number: 23-ERDD-02

BioVind Comments on CEC Gas R&D Initiatives

Additional submitted attachment is included below.



Jurri van Haaren, PhD
Chief Science Officer
BioVind Inc.
jvanhaaren@biovind.com

February 21, 2025

Jonah Steinbeck, Director
California Energy Commission
Docket Unit, MS-4
Docket No. 23-ERDD-02
715 P Street
Sacramento, CA

Comments on FY 2025-2026 CEC Gas R&D Research Initiatives: Pilot Projects to Advance Gas Decommissioning

Dear Mr. Steinbeck,

BioVind appreciates the opportunity to comment on the California Energy Commission (CEC) Gas Research and Development (R&D) Research Initiatives Workshop for fiscal year (FY) 2025-2026. We appreciate the thoughtful approach to driving innovation in the areas vital to California's transition toward a zero-emission energy future.

In line with the policy objectives of SB 1221, it is critical to ensure that aging gas pipelines are prioritized for replacement or decommissioning based on reasonable risk factors such as corrosion while minimizing costs, environmental hazards, and socioeconomic disparities. The CEC's Gas R&D Plan is well-aligned these objectives. In fact, the Plan's presentation notes that a recent study found "decommissioning paired with targeted electrification" can yield net benefits to gas and electric ratepayers, especially when avoiding the substantial costs of maintaining and replacing aging infrastructure.¹ The presentation further noted that California's gas distribution network is projected to incur \$43 billion in maintenance and replacement costs by 2045 under a business-as-usual scenario.²

Our comments will focus on: **What are the top criteria to consider in gas decommissioning pilot site selection?**

We recommend that site selection for decommissioning pilots explicitly integrate comprehensive corrosion and equity assessments combined with predictive modeling, alongside other technical feasibility and cost criteria. Doing so would directly support SB 1221's intent by ensuring that pipelines with higher likelihood of failure are identified and prioritized. Such an approach would not only protect public safety but also allocate ratepayer funds to where they can have the greatest impact, retiring riskier assets and reducing future maintenance costs.

¹ CEC Gas R&D Workshop, February 7, 2025, available at:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=261559&DocumentContentId=97965#:~:text=%E2%80%A2%20Recent%20study%20shows%20decommissioning,2024%20California%20Gas%20Report%2C%202024>

² Ibid.

Corrosion is a primary factor undermining pipeline integrity. Many older gas distribution systems, often composed of decades-old steel pipelines, are particularly susceptible. Corrosion accelerates deterioration, increasing the probability of leaks and posing significant safety and environmental risks. Importantly, these corrosion-prone pipelines frequently serve disadvantaged or underserved neighborhoods that historically bear disproportionate pollution burdens and often lack the resources for timely infrastructure upgrades.

Decommissioning efforts would benefit from a standardized, risk-based framework that integrates corrosion detection, predictive modeling, and equity considerations in determining pilot site selection. Key elements of this approach would include:

- Collect historical data on pipeline integrity and equity-related data such as socioeconomic indicators to help select pilot project areas.
- Perform baseline integrity surveys by deploying emerging corrosion monitoring and detection technologies to assess corrosion risk in pipelines across varied regional conditions.
- Integrate equity and corrosion assessment data into innovative predictive risk models.
- Generate tailored recommendations and a scalable framework for prioritization and implementation.

A well-structured, data-driven approach to gas pipeline decommissioning will support the achievement of California's energy transition goals safely, equitably, and cost-effectively. By guiding pipeline retirement decisions with robust predictive risk modeling, corrosion detection, and equity considerations alongside other technical feasibility and cost criteria, the CEC can ensure that decommissioning initiatives benefit all residents while minimizing financial and environmental risks.

We appreciate the CEC's leadership in gas system research and the opportunity to provide input. Thank you for considering these comments.

Sincerely,

Jurri van Haaren
Chief Science Officer