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Required Reclassification of All Engines as Non-Combustion Resources for 22-RENEW-01

Combustion is defined as when a substance chemically reacts with oxygen gas, releasing energy in the form of light or heat. Whether the "heat" from combustion is used directly or converted into electricity through any of the various processes does not matter.

Nevertheless, the California Energy Commission has rewarded a manufacturer(s) of a particular design of an internal combustion engine with a favorable classification as a Non-Combustion resource, despite any cogent justification other than the conflicted and bias assertion of one particular company. There exist no independent peer review technical paper that collaborates the CECs determination that the linear generator is a non-combustion device. Indeed, there are numerous peer reviewed papers on and about linear engines which detail the combustion involving "Homogeneous Compression Combustion Ignition" - or HCCI engines. Accordingly, the California Energy Commission must either correct the fraudulent miss-representation of linear generator as a non-combustion resource or alternatively reclassify all engines as non-combustion resources.