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Docket Number:	15-OIR-02
Project Title:	Modification of Alternative and Renewable Fuel and Vehicle Technology Program Funding Restrictions
TN #:	204705-14
Document Title:	Environ's Response to 3103 Regulation Questions
Description:	N/A
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Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	5/22/2015 3:59:31 PM
Docketed Date:	5/22/2015

ARFVTP: 3103 Regulation Response Form

1. What are the possible impacts for your project with the credit discount provision and the timeframe for when you expect to generate credits.

Based on our review of the documents you provided to us we have assessed the impact to the Inland Bio-Energy (IBE) project at the IEUA plant in Chino from the proposed changes to regulation 3103. If the credit discount provision is removed we should be able to receive a greater amount of revenue from sales of the any energy credits that we generate from the project. That would provide more funds to the IBE project which are needed to upgrade the existing equipment at the site and would allow a greater throughput of food waste for processing into biogas. The result would be greater diversion of food waste from landfills and more production of renewable energy from the waste. In summary the changes that are proposed should allow the IBE project to keep more of the funds generated from credit sales that would be applied to more improvements at the facility.

2. We would also like to provide you the opportunity to provide a statement for our record.

We would be in support of the elimination of section 3103 (b) from the regulation 3103.