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On Electric Program Investment Charge 2018 - 2020 Triennial Investment Plan

Additional submitted attachment is included below.

Docket No.17-EPIC-01: Electric Program Investment Charge
2018 – 2020 Triennial Investment Plan

Comment for Webinar on 2017 February 3
by Frank H. Shu, Astron Solutions Corporation
Submitted by email to: docket@energy.ca.gov

My comment concerns the role for biomass in the CEC's 2018 – 2020 Triennial Investment Plan. California has enormous potential resources for bioenergy in the form of agricultural residues, yard trimmings, and forestry wastes. New approaches exist at all stages of the spectrum, from research (R), to technology development (TD), and deployment (& D). These nascent industries convert residues, trimmings, and wastes into biofuels and electricity. But a bottleneck exists in establishing the logistical infrastructure of getting the feedstocks to the production facilities at a steady, reliable rate. If participants need to establish such infrastructure themselves, only the large well-established companies will be able to contribute, to the exclusion of small innovative start-ups that can make the breakthroughs that lead to the biggest difference in the long run.

An example is GFO-15-325 to turn beetle-infested pine trees into community-scale electricity. The responders in Group 2 (TD & D) to the call for proposals were expected to provide agreements from the forestry service for access to High Hazard Zones (HHZs), arrange guarantees of the needed supply of biomass, and provide the transportation of the biomass from the HHZs to the production sites where the generated electricity could be used by communities serviced by Investor Owned Utilities (IOUs). The complicated qualification procedures to establish such a supply and delivery chain effectively shut out from competition the companies with truly innovative and technology-ready methods to turn biomass into electricity, but without pre-existing agreements with established players that have the underlying infrastructure. To allow the bioenergy industry to develop properly, the State government should help Group 2 companies in any new call-for-proposals to establish the needed collection and transportation infrastructure.

Questions to Webinar staff

1. How does the State propose to level the playing field to allow new players?
2. Will there be a request proposal similar to GFO-15-325 during the 2018-2020 EPIC Triennial Investment Plan?