

DOCKETED

Docket Number:	17-IEPR-10
Project Title:	Renewable Gas
TN #:	220117
Document Title:	CR&R Comments 2017 IEPR Renewable Natural Gas
Description:	N/A
Filer:	System
Organization:	CR&R/Paul Relis
Submitter Role:	Public
Submission Date:	7/11/2017 2:33:11 PM
Docketed Date:	7/11/2017

Comment Received From: Paul Relis

Submitted On: 7/11/2017

Docket Number: 17-IEPR-10

2017 IEPR Renewable Natural Gas

Additional submitted attachment is included below.

July 10, 2017



The Honorable Robert Weisenmiller, Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on 2017 IEPR-Renewable Natural Gas

Dear Chair Weisenmiller,

CR&R, is the owner, builder and operator of what is the largest anaerobic digestion (AD) facility in California, located in Perris in Riverside County. This facility provides organics recycling for 14 Riverside and Orange County cities under long term contracts. The truck fleets that CR&R operate to serve these communities are required to use renewable gas as their transportation fuel. The facility will be the first large generator of renewable gas to interconnect with the natural gas grid beginning this September. Ten years in development with \$45 million invested by CR&R, with an additional \$10 million from the CEC, CalRecycle and the South Coast Air Quality Management District (SCAQMD), this is the benchmark AD plant in California for managing the state's municipal organic waste.

Based on our understanding of state policies on organics removal from landfill, renewable energy development and the state's intent to reduced Short Lived Climate Pollutants we urge the Commission to support the following:

- Establish a renewable gas standard; begin with a low standard of 1% and ratchet it up ever few years.
- Establish a purchase preference for in-state renewable gas.
- Require long-term off-take agreements for renewable gas, applicable to the entire gas supply
- Require long-term contracts for LCFS credits. Establish an LCFS credit reserve and third party market provides for long-term contracts and guaranteed credit values.
- Work with the PUC to reduce the cost of the interconnect for California based projects.
- Rule 30 should be consistent with out of state importers selling renewable gas in California.
- Rate base pipeline and transmission interconnect costs for renewable gas projects.
- Merge the CEC renewable gas heavy duty sector incentive funds with those of the AQMD and ARB programs to accelerate purchase of commercially available near-zero emission engine technology. Restrict incentive funding to in-state renewable gas facilities.

Thank you for your consideration of these recommendations.

Sincerely,

Paul Relis
Senior Vice President
CR&R Incorporated

11292 Western Ave.
P.O. Box 125
Stanton, CA 90680-2912

t: 800.826.9677
t: 714.826.9049
f: 714.890.6347