

## DOCKETED

<b>Docket Number:</b>	17-IEPR-01
<b>Project Title:</b>	General/Scope
<b>TN #:</b>	221760
<b>Document Title:</b>	Comments by the Coalition for Renewable Natural Gas on the Draft 2017 IEPR
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Nina Kapoor
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/13/2017 7:05:50 PM
<b>Docketed Date:</b>	11/13/2017

*Comment Received From: Nina Kapoor*

*Submitted On: 11/13/2017*

*Docket Number: 17-IEPR-01*

**Comments by the Coalition for Renewable Natural Gas on the Draft 2017 IEPR**

*Additional submitted attachment is included below.*



**October 13, 2017**

California Energy Commission  
Attn: Chairman Robert B. Weisenmiller  
1516 Ninth Street  
Sacramento, CA 95814

**RE: 2017 Draft Integrated Energy Policy Report [Docket #17-IEPR-012017]**

Dear Chairman Weisenmiller,

The Coalition for Renewable Natural Gas (RNG Coalition) thank you for the opportunity to provide written feedback on the 2017 Draft Integrated Energy Policy Report (Report). We applaud the California Energy Commission for the thoughtful and thorough analysis outlined in Chapter 9: Renewable Gas. However, we also believe that the recommendations identified fall short of the intent of language contained in SB 1383 that the California Energy Commission to develop recommendations for development and use of renewable gas. We respectfully ask that you strengthen the recommendation to implement policies to build commercial markets for renewable gas (page 294) by directing state agencies to explore the use of renewable natural gas (RNG) procurement mandates for the reduction of waste-based sources of fugitive methane identified by the CEC as "cost effective," call for rate-basing of utility infrastructure for RNG development, and commit to focus on RNG in the 2018 IEPR Update.

We believe that policies designed to utilize the waste-based sources of fugitive methane that are most cost-effective represent a crucial opportunity to decarbonize our economy while helping California meet its environmental goals by capturing and converting for productive end-use methane that would otherwise be flared (combusted and wasted) or worse, escape fugitively into the atmosphere as a highly potent short-lived climate pollutant. According to the excellent analysis in the Draft Report (page 263), capturing fugitive methane from the organic fraction of municipal solid waste, dairies, wastewater treatment facilities, and landfills represent such cost-effective opportunities. The development of such RNG production facilities will simultaneously foster improved management of waste streams, reduce soil and water impacts and stimulate California's clean energy economy.

## **Who We Are**

The RNG Coalition is a non-profit organization based in California that represents and provides public policy advocacy on behalf of the renewable natural gas (RNG, biomethane, upgraded biogas) industry in North America. Our membership is comprised of leading companies operating in each sector of the industry, including but not limited to producers of greater than 90% of all the RNG produced in the United States and Canada.

## **RNG Procurement Mandates**

We urge the CEC to recommend that California institute RNG procurement mandates pursuant to its directive under SB 1383 to develop recommendations for the cost-effective development and use of renewable gas that is consistent with existing state policy and climate change goals. RNG procurement mandates will help the state achieve the five environmental targets identified in section 39730.8(b) of the Health and Safety Code. Specifically mandating the procurement of RNG derived from the recycling of organic waste will help the state achieve the waste reduction targets codified by SB 1383. This will create a market pull for the recycling of organic waste through mechanisms such as anaerobic digestion.

Mechanisms that should be explored include, but need not be limited to:

- Mandated purchasing of RNG by investor-owned utilities as a part of their gas and energy portfolio.
- Mandated purchasing of RNG by municipally owned utilities as a part of their gas and energy portfolio.
- Mandated use of RNG in municipally-owned heavy duty fleets and commercial vehicles.
- Mandating local governments to provide a preference to waste haulers using RNG powered vehicles.

These policies would help drive organic waste recycling markets necessary to achieve the organic waste reduction mandates in SB 1383 and the Short-lived Climate Pollutant strategy and help decarbonize the state's economy.

## **Utility Infrastructure Investment**

California must develop RNG resources in California in order to meet the goals set forth in SB 1383. In order to do so, critical utility infrastructure investments are needed. We ask that the CEC recommend rate-basing investment in RNG infrastructure related to pipeline transportation, gas processing and quality management, and gas measurement.

## **Inclusion in the 2018 IEPR Update**



Due to the critical role of the development of renewable gas in meeting California's short-lived climate pollutant, short-lived climate pollutant, environmental and public health goals, we ask that the CEC focus on renewable gas in the 2018 IEPR Update to further explore the concepts discussed here.

**Conclusion**

The Coalition for Renewable Natural Gas would like to acknowledge the hard work and due diligence CEC staff has demonstrated in drafting the Draft Report. We look forward to continuing to partner with the California Energy Commission to ensure the effective implementation of SB 1383 in order to achieve California's short-lived climate pollutant, environmental and public health goals.

Please do not hesitate to contact me directly with any questions or concerns.

Sincerely,



Nina Kapoor  
Director, State Government Affairs  
Coalition for Renewable Natural Gas  
916.550.3192  
Nina@RNGCoalition.com