

DOCKETED

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Comment Received From: Bill Mattos

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Proposed CEC Food Production Investment Program

Additional submitted attachment is included below.



February 28, 2018

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 18-MISC-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Proposed CEC Food Production Investment Program

The California Poultry Federation (CPF) appreciates the opportunity to provide input on the implementation of the Food Production Investment Program. This program is very important to the economic and environmental sustainability of poultry processing operations in California. Poultry processors face intense competitive pressure from national competitors who do not incur the direct and indirect costs of California's climate policies.

CPF appreciates consideration of the following as you implement this program:

1. Eligibility for funding should be focused on entities facing the most stringent compliance requirements consistent with the intent of the Brown Administration and Legislature in making this funding available as part of the extension of the state's landmark Cap and Trade program. Consistent with this approach, eligibility in Tier II should be limited to only those facilities with a direct compliance obligation under the C & T program. Eligibility for funding in the Tier I program should be prioritized based on regulatory compliance requirements with all food processors eligible.
2. Program goals should be broadened to place less emphasis on "cutting edge" technologies and should more appropriately focus on effective and efficient technologies that can be implemented to improve the overall environmental and economic sustainability of regulated facilities. Effective and efficient project proposals should be encouraged irrespective of whether a technology is determined to be "cutting edge" or not.
3. Any reporting requirements should address the need to provide project performance data while protecting commercially sensitive information.
4. Evaluation criteria should be expanded to directly include consideration of environmental and community benefits that go beyond the primary objectives of GHG reduction and energy efficiency. Projects that can reduce dependence on fossil fuels and provide job retention, criteria pollutant reductions and other community benefits should be scored accordingly.
5. CPF generally supports the proposed funding levels for both tiers and recommends ensuring sufficient flexibility to allow funds to be shifted between the programs should supply and demand warrant it.

CPF appreciates consideration of these comments and looks forward to the development and implementation of a highly successful program.

Respectfully submitted,

Bill Mattos
President