

**DOCKETED**

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<b>Document Title:</b>	The Wonderful Comapny's Comments on REAP Draft Guidelines
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*Comment Received From: Melissa Frank (Poole)*  
*Submitted On: 6/29/2018*  
*Docket Number: 18-MISC-03*

**The Wonderful Comapny's Comments on REAP Draft Guidelines**

*Additional submitted attachment is included below.*



June 29, 2018

*VIA Electronic Submission*

Geoff Dodson  
California Energy Commission  
Renewable Energy for Agriculture Program  
1516 Ninth Street, MS-45  
Sacramento, CA 95814

**Re: Renewable Energy for Agriculture Program (REAP) DRAFT Guidelines**

Dear Mr. Dodson,

The Wonderful Company LLC (“Wonderful”) appreciates the opportunity to provide comments to the California Energy Commission (“CEC”) on the Renewable Energy for Agriculture Program (REAP) DRAFT Guidelines.

Wonderful and its related entities farm and process almonds, pistachios, citrus, pomegranates, nursery stock, and wine grapes throughout California. Every year we grow, harvest, package and ship healthy products to our customers on a global scale. The REAP program is a critical tool for helping California agriculture expand its environmental stewardship, to improve air quality and reduce greenhouse gases. As such, we respectfully make the following comments as the CEC moves forward to adopt the Draft Guidelines:

- 1) We support including language to ensure that funding is available to eligible agricultural entities in order to update and modernize food processing equipment, including dryers.
- 2) We support including the option to self-certify post project emissions and for the clear reporting requirements, however, we suggest biannual reporting instead of quarterly reporting.
- 3) We support maintaining the aggressive schedule to encumber funds by June 30, 2019.
- 4) We request that monetary caps on awards be removed as this could possibly exclude large scale projects with potentially better cost-effectiveness than other projects.
- 5) We request that *if* caps on awards are not removed, projects that exceed the caps be allowed to apply for funding up to the maximum capped amount to fund a portion of a project.
- 6) We ask that “3d” of the technical scoring criteria be explained as it is unclear what knowledge a project that implements existing and proven technologies is expected to gain and share with others.
- 7) Preference consideration “a” should be removed as it could unfairly limit projects for being in highly agricultural and/or agriculture processing areas active in grant applications and emission reductions.
- 8) Preference consideration “b” does not relate to a project’s ability to reduce emissions and should therefore be removed.

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- 9) We request clarification on applicability of prevailing wage requirements if it is legally determined that the project is not a public works project.
- 10) Please clarify in Chapter 3, section C “Audits and Access to Facilities” that project-related data means data related to project GHG emissions and emission offsets (not information such as processing throughputs or similar data).

We would be happy to discuss our recommendations at your convenience.

Sincerely,



Melissa Frank (Poole)  
Senior Counsel/Director of Government Affairs