

DOCKETED

Docket Number:	18-MISC-03
Project Title:	Renewable Energy for Agriculture Program
TN #:	225057
Document Title:	Tanja Srebotnjak Comments Comments on Renewable Energy for Agriculture Program Draft Guidelines - Version 2 (18-MISC-03)
Description:	N/A
Filer:	System
Organization:	Tanja Srebotnjak
Submitter Role:	Public
Submission Date:	10/22/2018 11:32:05 AM
Docketed Date:	10/22/2018

Comment Received From: Tanja Srebotnjak
Submitted On: 10/22/2018
Docket Number: 18-MISC-03

Comments on Renewable Energy for Agriculture Program Draft Guidelines - Version 2 (18-MISC-03)

I would like to commend the California Energy Commission and in particular the people involved in creating the draft REAP Guidelines. The opportunity to apply for funding under AB 109 to implement renewable energy projects in agriculture will contribute to making agriculture in California more sustainable by reducing greenhouse gas emissions. I would like to contribute the following comments to the finalization of the REAP Guidelines.

Page 4, Table 1: The definition for Agricultural Operations appears to be ad-hoc. I'm curious why this particular definition was chosen and not, for example, a NAICS-compatible definition that would make it easier to link the projects and achieved GHG reductions to other GHG-focused assessments based on standardized definitions of agricultural operations such as NAICS?

Page 6, Chapter 2.A first paragraph: The text states that onsite renewable energy technologies WILL reduce demand for other energy sources. This is a bit of a leap of faith, especially if the new renewable energy supply creates new demand and hence only adds to energy use, albeit being low-carbon in nature. It might be better to say **IS EXPECTED TO REDUCE**.

Page 6, Chapter 2.A first paragraph: The text states **FOSSIL FUELS AND NATURAL GAS**. As pointed out earlier in the text, natural gas is also a fossil fuel. It would be more accurate to say **FOSSIL FUELS, INCLUDING NATURAL GAS**.

Page 7, Chapter 2.B first paragraph: The following terms should be added to Table 1 on page 4 for clarity:

- energy usage
- baseline energy usage
- renewable energy technology
- related equipment serving agricultural operations
- project life

Page 8, Eligibility Criteria: The text states that **ACADEMIC** institutions are eligible to apply, but it does not mention other educational institutions such as K-12 schools or school districts. However, the definition of **AGRICULTURAL OPERATIONS** seems to include educational institutions. I would, therefore, recommend explicitly including educational institutions and properly define which of those are eligible to apply for REAP project funding.

Page 9, Eligible Projects. The text states that **BIOMASS GENERATING** projects are eligible. It would probably be more clear to refer to **BIOMASS-TO-ENERGY** projects. The text further states that projects replacing equipment using energy from fossil fuels with equipment using **ELECTRICITY** from **RENEWABLE ENERGY SOURCES**. Thus, it appears that projects

generating HEAT or FUEL from renewable energy sources are excluded? It would be helpful to clarify the types of energy generated renewable energy projects that are eligible and to give examples of ineligible technologies.

Page 9, Eligible Projects: Will projects, in order to be eligible to receive funding from the California GGRF, need to serve disadvantaged populations?

Page 10, Funding: Will it be allowed to include matching funds, in-kind contributions, or to combine REAP funds with funding from other sources? This question is not currently addressed in the Funding section but might be relevant.

Page 11, Solicitation Procedures. The text requests that project applications indicate whether the project will benefit priority populations. In connection with my comment for Page 9, Eligible Projects, it would be helpful to clarify if such benefits are required and hence part of the scoring process or if they are part of the scoring process even if such benefits are optional. This is particularly important since it appears that Table 4 on Page 14 does include priority populations as a scoring item and that projects will be directed towards such goals as per Section E.

Page 15, Section F. The text states that recipients of project funding will meet for a kick-off meeting. Where will this meeting take place and can recipients participate remotely via audio-video or audio-only link? The same question applies to the interim project review meetings.