

**DOCKETED**

<b>Docket Number:</b>	19-SB-100
<b>Project Title:</b>	SB 100 Joint Agency Report: Charting a path to a 100% Clean Energy Future
<b>TN #:</b>	230257
<b>Document Title:</b>	Western Agricultural Processors Association Comments - WAPA Comments SB-100
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Western Agricultural Processors Association
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	10/17/2019 11:38:46 AM
<b>Docketed Date:</b>	10/17/2019

*Comment Received From: Western Agricultural Processors Association*  
*Submitted On: 10/17/2019*  
*Docket Number: 19-SB-100*

**WAPA Comments SB-100**

Attached are comments from Western Agricultural Processors Association.

*Additional submitted attachment is included below.*



WESTERN AGRICULTURAL PROCESSORS  
ASSOCIATION

1785 N. Fine Avenue, Fresno, California 93727  
559-455-9272  
f: 559-251-4471

[www.agprocessors.org](http://www.agprocessors.org)

October 16, 2019

The Honorable Drew Bohan  
Executive Director  
California energy Commission  
1415 Ninth Street  
Sacramento, CA 95814

Re: ***SB 100 Joint Agency Report – Docket Number 19-SB-100***

Dear Director Bohan,

On behalf of the over 160 tree nut hullers and processors of almonds, pecans, pistachios and walnuts throughout California, we are hereby submitting comments for the SB 100 Joint Agency Report. While we support renewable energy, we are very concerned with the electricity rate impacts and corresponding cost increases our members will face as a result. In addition, we are concerned about reliability as the state transitions from traditional steady state operations to more variable energy supplies, such as wind or solar. We do however, strongly support bioenergy, especially those technologies that utilize agricultural wood waste, such as pruning or orchard removal material that traditionally goes to landfills, biomass plants that are disappearing or is burned in the open. Pyrolysis conversion to renewable gas for consumption in our facilities or used to generate electricity would be welcome solutions to a growing problem.

When we look at costs of renewable energy, we are greatly concerned with what the future holds for us. Current California commercial/industrial electricity costs are among the highest in the nation, and in many cases substantially higher. The push to increase renewable energy in the utilities portfolio will only increase these costs higher. According to the National Renewable Energy Laboratory (NREL)<sup>1</sup> “as more variable renewable energy (VRE) such as wind and solar are integrated into electric power systems, technical challenges arise from the need to maintain the balance between load and generation at all timescales”. This will call for battery storage on a grand scale, and/or increased transmission lines to balance loads with neighboring states. This fact must be considered when moving forward and must be mitigated in every way possible.

---

<sup>1</sup> KROPOSKI, B. J. Mod. Power Syst. Clean Energy (2017) 5: 831.  
<https://doi.org/10.1007/s40565-017-0339-3>

Finally, as we look to increasing renewable energy, California must consider agricultural biomass as one potential source. Not just to provide energy, but to help resolve other issues surrounding biomass. What will the impacts be if all the biomass plants continue to shut down, especially to landfills and air quality. There are newer, cleaner technologies that utilize pyrolysis now, and should be included and incorporated into this effort. Not only does it help alleviate an air quality concerns, it can significantly help balance the grid.

In closing, the tree nut industry is seriously concerned about rising electricity costs and questions about grid reliability as we increase the renewable fraction of the energy supply. The agencies must address cost impacts as this effort moves forward in order for business in California to remain economically viable. At the same time we look forward to how bioenergy can play a role in this and the opportunities it may present. Thank you for the opportunity to provide comments and we look forward to seeing how the agencies will address these concerns moving forward.

Sincerely,

A handwritten signature in blue ink that reads "Roger A. Isom". The signature is fluid and cursive, with the first name "Roger" being the most prominent.

Roger A. Isom  
President/CEO