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PCAPCD Comments--E3â€™s Deep Decarbonization Report and Recommendations to the CEC

Additional submitted attachment is included below.



March 4, 2020

The Honorable David Hochschild, Chair
The Honorable Andrew McAllister, Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: E3's Deep Decarbonization Report and Recommendations to the CEC

Dear Chair Hochschild and Commissioner McAllister:

The Placer County Air Pollution Control District (District) supports SB 100's carbon reduction goals and looks forward to working with state and local partners to realize a more climate resilient California. The District would like to emphasize the Lawrence Livermore National Laboratory's new 2020 report, *Getting to Neutral: Options for Negative Carbon Emissions in California*, which clarifies the necessity of natural and working lands to achieve carbon neutrality. In fact, it concludes that it is only through incorporating natural and working land investments that California can achieve an annual 125 million tons of carbon reduction by 2045. They suggest many approaches towards integrating bioenergy into California's energy mix to ensure organic waste is optimized for societal benefit and climate resiliency.

Bioenergy can provide non-intermittent power to our rural areas that are expected to experience unreliable power, as wildfire and PG&E power shutoffs (PSPS) continue to occur over the next decade. Biomass to energy facilities are one of the only solutions that can offer a dynamic blend of grid stability, forest resilience and long-term carbon reduction. Biogas provides a valuable non-intermittent resource that can combine with wind and solar to create a diverse energy portfolio, while also offering the most useful option to repurpose forest residue expected to emerge from increased restoration efforts throughout the state. Through the proper recognition and investment in substations and other interconnection infrastructure, bioenergy can provide the firm generation capacity needed to ensure reliable electric load service on a deeply decarbonized electricity system.

The District has reviewed E3's *Deep Decarbonization Report's* low-cost scenarios and other information within the report. Note that the residual estimates were based off research which predated drastic landscape scale changes in California. The 2015 drought and subsequent tree mortality die off, in addition to current imperatives to restore the forested regions of California, have created an immense increase in forest biomass and residuals. A model which anticipates biomass availability must consider the full amount that is to be treated today, in order to get an accurate understanding of realistic expectations. Currently, the goal of the forest community needs to be treatment of one million acres annually to restore our headwater forest ecosystems. We suggest review of the *High Hazard Fuels Availability Study*, published in 2019 for the High Hazard Fuel Study Committee of the Forest Management Taskforce and PG&E, and the results of the California Biopower Impacts Project, led by Humboldt State University (EPC 16-306). Low-cost

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solutions, as highlighted by E3, must be weighed against the economic and environmental consequences, which requires a serious assessment of natural and working lands emissions and their potential to add to California's decarbonized future.

The CEC should also acknowledge the relevant policies that have shaped the current landscape of biomass to energy facilities into the California market. If we assume California will reach the pace and scale proposed by the Forest Carbon Plan and the Natural and Working Lands Strategy, there will be a significant amount of fuels to support biogas facilities for the future. Below are updates that reflect this sentiment and what E3's report does not emphasize in full:

- California has passed legislation requiring increased forest thinning and other vegetation removal around communities and other infrastructure;
- Hundreds of millions of dollars in cap & trade revenues have been allocated to dairy digesters, diverted organic waste to energy projects, and forest fuel removal;
- The CPUC has increased requirements for vegetation removal around power lines;
- CalFire has identified 35 priority projects for forest and vegetation removal;
- California Air Resources Board has funded a feasibility study to look at converting forest, agricultural and urban wood waste to biomethane;
- The CPUC has proposed a definition of renewable gas that would include the biogas from gasification of organic waste;
- Several new small-scale bioenergy projects under the BioMAT program have accepted Power Purchase Agreements for projects that will convert forest and agricultural waste to biogas using gasification.

We urge the CEC to look more in depth into our comments, as it is essential that our decarbonization future fully acknowledge the role forested landscapes play in energy planning. We are very grateful that at the February 24, 2020 workshop, staff agreed that the SB 100 study would not recommend removal or restriction of biomass or biogas from California's diverse energy portfolio. We hope the Commission will go one step further and begin to look at ways to expand such use, consistent with the Lawrence Livermore Lab study, and consistent with what our rural communities need in conjunction with land management for reduction of wildfire, local economy improvement and forest health.

Sincerely,



Erik C. White
Air Pollution Control Officer