

DOCKETED

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SUPPORT - Alternative Fuel Production and Supply

Additional submitted attachment is included below.



March 17, 2020

Commissioner Patricia Monahan
Transportation Commissioner, California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**RE: Clean Transportation Program 2020-23 Investment Plan –
SUPPORT - Alternative Fuel Production and Supply**

Dear Commissioner Monahan,

CR&R Environmental Services (CR&R) would like to express our support for the 2020-23 Investment Plan, which would allocate \$35 million to alternative fuel production and supply. We request that biomethane production be prioritized under this section.

Founded in 1963, CR&R is a Southern California-based waste and recycling collection company, serving more than 3 million people and over 25,000 businesses through Orange, Los Angeles, San Bernardino, Imperial, and Riverside counties. We operate the state's largest anaerobic digester facility for organics processing and power our vehicle fleet from renewable natural gas derived from organic waste.

As required by SB 1383 (Lara, 2016), the state must recycle 75 percent of its organic waste by 2025 as part of its requirement to reduce methane emissions 40% below 2013 levels by 2030. CalRecycle estimates that 50 to 100 new and expanded facilities will be needed to achieve this goal at a cost of \$2-\$3 billion. An all-the-above technology approach will be needed to achieve this – anaerobic digestion, composting, and wastewater facilities.

Furthermore, transportation emissions comprise nearly 50% of annual statewide emissions. Heavy-duty vehicles are the most concentrated source, causing 23 percent of emissions from just 3% of the vehicles on the road.¹ Decarbonizing the medium- and heavy-duty sector is the optimal place to see tangible emissions reductions that help the state meet its environmental goals.

As staff has pointed out, biomethane provides significant emission reductions. When derived from green waste, it has a negative carbon intensity around 125 percent below diesel. The University of California, Davis, Institute of Transportation Studies, indicated in 2016 that capturing biomethane from all potential sources of organic waste in California could represent roughly 623 million diesel gas equivalent or roughly, 20 percent of diesel fuel use in California.

¹ California Energy Commission (2015). Technology Merit Review: Medium- and Heavy-Duty Vehicles.

We agree with Investment Plan's recognition that biomethane production should be prioritized for transportation applications when zero-emission alternative technology is not available. We would welcome the opportunity to discuss CEC's considerations for determining when zero-emission alternative technology exists (i.e. commercially available). As the state decides on which fuels to invest and prioritize, the focus should be on fuels that provide immediate air quality benefits as well as help the state meet its environmental mandates. To that end, biomethane production derived from organic waste sources should be prioritized.

We would like to thank staff for the work they have put in to the 2020-23 Investment Plan and look forward to discussing our comments further. Please do not hesitate to contact me at johnm2@crrmail.com or at (714) 372-8281 if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "JRM", with a long horizontal flourish extending to the right.

John McNamara
Vice President
CR&R Environmental Services