

**DOCKETED**

<b>Docket Number:</b>	20-IEPR-02
<b>Project Title:</b>	Transportation
<b>TN #:</b>	234541
<b>Document Title:</b>	Bioenergy Association of California Comments - BAC Comments on 2020 IEPR
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Bioenergy Association of California/Julia A Levin
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/31/2020 2:47:46 PM
<b>Docketed Date:</b>	8/31/2020

*Comment Received From: Julia A Levin  
Submitted On: 8/31/2020  
Docket Number: 20-IEPR-02*

**BAC Comments on 2020 IEPR**

*Additional submitted attachment is included below.*



August 31, 2020

The Honorable Drew Bohan,  
Executive Director  
California Energy Commission  
Sacramento, CA 95814

**Re: Need to Include Biomethane Procurement or Strategic Biomethane Reserve in 2020 IEPR**

Dear Director Bohan:

I am writing on behalf of the Bioenergy Association of California (BAC) to urge the CEC to include specific recommendations for biomethane procurement as part of the *2020 Integrated Energy Policy Report*. Increasing biomethane production and use is critical to meet the state's climate change, air quality, waste reduction, and clean energy goals. Biomethane from organic waste can provide carbon negative electricity, long-duration energy storage, fuel for backup generators and heavy duty vehicles, hydrogen for fuel cells, combined heat and power, and more. To accelerate the production and use of biomethane, as many state laws already call for, the 2020 IEPR should recommend a biomethane procurement program or strategic biomethane reserve that focuses on the in-state production and use of biomethane from all organic waste feedstocks.

BAC represents more than 75 public agencies, local governments, private companies, environmental groups, community groups, utilities, and others working to convert organic waste to sustainable bioenergy development. BAC urges the Commission to include a biomethane recommendation in the 2020 IEPR for the reasons below.

1. **Increasing Biomethane Production Critical to Achieve State's Climate Policies.**

Converting organic waste to energy is critical to reduce Short-Lived Climate Pollutants, which are tens to thousands of times more damaging to the climate than carbon dioxide. California is relying on SLCP reductions for more than one-third of all the carbon reductions needed to meet the requirements of SB 32 (Pavley, 2016).<sup>1</sup> The

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<sup>1</sup> *California's 2017 Climate Change Scoping Plan*, adopted by the California Air Resources Board in November 2017, at 28, Figure 7.

state's *Short-Lived Climate Pollution Reduction Strategy*, in turn, relies heavily on bioenergy to reduce methane and black carbon emissions from the decay or burning of organic waste. CalRecycle's regulations to implement SB 1383 (Lara, 2016) rely heavily on bioenergy to put diverted organic waste to beneficial use.

Bioenergy is also critical to achieve carbon neutrality by mid-century. According to a recent report by Lawrence Livermore National Lab, bioenergy can provide more than two-thirds of all the negative carbon emissions needed to achieve carbon neutrality.<sup>2</sup>

## 2. Increasing Biomethane Production and Use Critical to Reduce Air Pollution

Increasing in-state biomethane production and use can reduce air pollution significantly. Biogas generated from forest or agricultural waste that would otherwise be open burned cuts particulate matter and black carbon by 99 percent, methane and other volatile organic compounds by 95 percent or more, and smog-forming pollution by 40 to 70 percent.<sup>3</sup> Biogas used in near-zero emission natural gas trucks can cut NOx and toxic air contaminants more than 90 percent compared to heavy-duty diesel trucks.

## 3. Increasing Biomethane Production and Use Critical to Clean Energy Goals

Both Southern California Edison and PG&E have stated that biogas is critical to reach 100 percent renewable electricity. Biomethane can provide flexible generation and baseload power, longer duration energy storage, renewable hydrogen for fuel cells, and other grid reliability services. PG&E also stated at a recent CPUC workshop that biogas is critical for microgrids because it can provide backup generation and long-duration storage, which batteries cannot do. Numerous other studies, including a recent study by E3 for the California Energy Commission, have found that California will continue to need some amount of gas for energy reliability. Biogas can provide a low carbon or carbon negative alternative to fossil fuel gas. Biogas can also provide fuel for hard to electrify end uses, including many commercial and industrial applications, heavy duty trucks, and airplanes.

## 4. Biomethane Production Critical to State's Wildfire and Forest Health Goals

The state has enacted several laws and policies to reduce the risk of wildfire and restore forest health, including legislation, emergency orders and, most recently, an agreement with the United States Forest Service to increase forest fuel removal on one million acres per year. To avoid an increase in air and climate pollution, which are emitted by open burns and controlled fire as well as wildfire, the state will need to increase infrastructure to convert forest biomass and other vegetation to energy and

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<sup>2</sup> Lawrence Livermore National Lab, *Getting to Neutral – Options for Negative Carbon Emissions in California*, January 2020. LLNL-PRES-795982.

<sup>3</sup> CAPCOA Policy Statement on Biomass Power Plants" adopted December 2016, at page 1.

biochar. It will be critical, therefore, to provide a market for the biomethane that can be generated from forest biomass and other vegetation removed for wildfire mitigation.

#### 5. Increasing Instate Biomethane is Required by Numerous State Laws

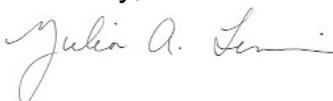
Over the past decade, California has enacted numerous laws requiring the state to increase in-state biomethane production and use. Those include:

- AB 1900 (Gatto, 2012) requires that “the commission shall adopt policies and programs that promote the in-state production and distribution of biomethane. The policies and programs shall facilitate the development of a variety of sources of in-state biomethane.”
- SB 1122 (Rubio, 2012) requires the commission to “encourage gas and electrical corporations to develop and offer programs and services to facilitate development of in-state biogas for a broad range of purposes.”
- AB 2313 (Williams, 2016) requires the commission to consider options to increase in-state biomethane production and use.
- SB 840 (Budget, 2016) states that for “California to meet its goals for reducing emissions of greenhouse gases and short-lived climate pollutants, the state must . . . increase the production and distribution of renewable and low-carbon gas supplies.”
- SB 1383 (Lara, 2016) requires state agencies to “adopt policies and incentives to significantly increase the sustainable production and use of renewable gas, including biomethane and biogas” and to “consider additional policies to support the development and use in the state of renewable gas, including biomethane and biogas, that reduce short-lived climate pollutants in the state.”
- SB 1440 (Hueso, 2018) requires the CPUC to consider adoption of a biomethane procurement program to increase in-state biomethane production and use.

In addition, the California Air Resources Board announced in mid-August that it will consider adoption of an RNG procurement requirement as part of its next climate change scoping plan.<sup>4</sup> Presumably, ARB is considering this as a way to reduce Short-Lived Climate Pollutant emissions and provide the carbon negative emissions needed to achieve carbon neutrality. It is the CEC’s role, however, to consider how best to do this for energy purposes, which should be done as part of the 2020 IEPR.

For all these reasons, BAC urges the Commission to recommend a biomethane procurement program and/or strategic biomethane reserve as part of the 2020 IEPR.

Sincerely,



Julia A. Levin  
Executive Director

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<sup>4</sup> ARB staff presentation at public workshop on carbon neutrality, August 19, 2020, via webinar.