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BAC Comments on SB 423 Report

Additional submitted attachment is included below.



August 16, 2024

The Honorable Siva Gunda, Vice Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on Draft SB 423 Report (21-ESR-01)

Dear Vice Chair Gunda:

I am writing on behalf of the Bioenergy Association of California (BAC) to express serious concerns about the Draft Staff Report on SB 423. The Draft Report contains helpful information about some forms of firm power, but omits or mischaracterizes important technologies and fails to accurately characterize the different operational benefits of different technologies and fuels. In particular, BAC is concerned that:

- The Draft Report does not include biomass as one of the six categories of firm power generation even though the CEC itself has estimated that waste biomass can provide 6,000 to 7,000 MW of power.¹
- The Draft Report assumes that waste biomass (including forest and agricultural waste) must be converted to pipeline quality RNG or hydrogen before being converted to power, which is not correct.
- The Draft Report fails to mention that the State has a goal of forest fuel removal on 2.3 million acres annually and has banned open burning of agricultural waste in the San Joaquin Valley which, together, will generate more than ten million tons of waste biomass that can be converted to firm power.²
- The Draft Report fails to mention the air quality and climate benefits of converting waste biomass to power, which (according to CalEPA and CNRA) can cut particulate matter, methane and carbon monoxide emissions by 98 percent compared to open burning or wildfires.³
- The Draft Report fails to mention that bioenergy, in addition to providing firm power, is the only form of power that can provide carbon negative emissions that

¹ 2012 Bioenergy Action Plan.

² 2022 *Climate Change Scoping Plan for Achieving Carbon Neutrality*, issued by the California Air Resources Board on November 15, 2022, at page 99.

³ *California Forest Carbon Plan*, adopted by CalEPA and CNRA in March 2017, at pages 130 and 135.

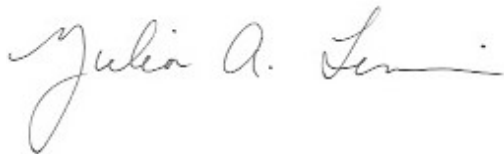
are essential to reach carbon neutrality.⁴ SB 423 requires that the report put an “emphasis on reducing the emissions of greenhouse gases,”⁵ but the Draft Report omits biomass which can provide carbon negative emissions.

- The Draft Report includes solar plus storage for 8-hour duration, which does not meet the test of SB 423 for firm renewables that can provide power during “multiday or extreme weather events.”

BAC urges the CEC to correct the Draft Report to include an assessment of the potential for waste biomass (not RNG) to provide firm power and the GHG and air pollution reduction benefits it can provide compared to open burning or wildfires. Omitting these important analyses would fail to comply with the explicit requirements of SB 423. In addition, including resources that, even in combination, only provide eight hours of power generation is inconsistent with the requirement of SB 423 to focus on firm renewable power that can provide multiday generation during extreme weather events. Since the most likely extreme weather is heavy wildfire smoke or heavy rain for multiple days, solar plus storage for eight hours utterly fails to meet the criteria of SB 423.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Julia A. Levin".

Julia A. Levin
Executive Director

⁴ 2022 *Climate Change Scoping Plan for Achieving Carbon Neutrality*, above, and Lawrence Livermore National Lab, *Getting to Neutral – Options for Negative Carbon Emissions in California*, January 2020. LLNL-PRES-795982.

⁵ Public Resources Code section 25216.7(b)(1).