

**DOCKETED**

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*Comment Received From: Pioneer Community Energy  
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**on the Proposed Scope for the Draft RPS Eligibility Guidebook,  
Tenth Edition**

*Additional submitted attachment is included below.*

November 1, 2024

California Energy Commission  
Docket Unit, MS-4  
Docket No. 21-RPS-02  
715 P Street,  
Sacramento, CA 95814

**RE: Comments of Pioneer Community Energy on the Notice and Request for Comment on the Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition [CEC Docket #21-RPS-02]**

Dear Commissioner Gallardo and Commission Staff,

Pioneer Community Energy (Pioneer) respectfully submits these comments to the California Energy Commission (Commission) on the *Notice and Request for Comment on the Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition*, issued on October 18, 2024. Pioneer supports the inclusion of biomass topics within the scope of potential changes for the next edition of the Guidebook. Pioneer urges the Commission to consider changes to the Guidebook that would reduce both the barriers to the certification of biomass facilities as well as burdens associated with reporting and verification. The Guidebook should also provide guidance to potential developers on the biomass conversion technologies that are eligible and ensure accurate accounting of the generation from these sources.

Pioneer is a community choice aggregator (CCA) serving residential and business customers located within the cities of Auburn, Colfax, Grass Valley, Lincoln, Nevada City, Placerville and Rocklin, the Town of Loomis, El Dorado County, and portions of unincorporated Placer County not currently served by Liberty Utilities. Pioneer initiated customer service in February 2018 and currently serves approximately 170,000 retail electric accounts. Most of Pioneer's customers are located in or near forested areas that are designated as Tier 2 (elevated fire risk) or Tier 3 (extreme fire risk) on the California Public Utilities Commission's (CPUC) High Fire Threat District Map.<sup>1</sup> In order to help support the reduction of the severe wildfire risks facing its communities, Pioneer has promoted and helped to develop biomass energy projects, with an emphasis on projects that can utilize feedstock from wildfire vegetation management activities.

Beyond supporting wildfire risk reduction, expanding biomass is also a key strategy for achieving California's renewable and zero carbon goals. Because biomass fuels can be used in combustion generation facilities, it is one of the few renewable fuel technologies that is dispatchable and, as such, helps to support the reliability of the grid. In 2021, the CPUC ordered the procurement of 1000 MW of firm generating resources (capacity factor of at least 80 percent) with zero carbon emissions, and

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<sup>1</sup> CPUC Fire Threat Map, Aug. 19, 2021, available at: <https://files.cpuc.ca.gov/safety/fire-threatmap/2021/CPUC%20Fire%20Threat%20Mapv.308.19.2021.Letter%20Size.pdf>.

biomass was one a small number of resource types with the operational capabilities necessary to meet this procurement order.<sup>2</sup> Biomass also adds to the diversity of renewable technology types, making California’s grid more robust. Additionally, biomass provides unique opportunities to aggressively decarbonize California’s economy. As recognized in both Senate Bill 1075 (stats. 2022) and the Commission’s 2023 Integrated Energy Policy Report,<sup>3</sup> a 2020 study by Lawrence Livermore National Laboratory concludes that biomass gasification with capture and storage of the resulting carbon emissions has the greatest potential for removing carbon at the lowest cost per ton.<sup>4</sup>

In light of the role that biomass can play in supporting both wildfire risk reduction and achieving California’s environmental goals, it is essential that the Commission ensure that the RPS Eligibility Guidebook not act as a barrier or impediment to the deployment of biomass technologies. As part of the revisions considered for the 10<sup>th</sup> edition of the RPS Eligibility Guidebook, the Commission should ensure that the verification and tracking requirements are clear, reasonable, and easy to comply with. Additionally, the Guidebook should provide clear guidance on the types of biomass conversion technologies that are eligible to be certified and that the applicable requirements are reflective of currently available technologies and advancements in the industry. Pioneer encourages the Commission to consider these issues in one or more workshops and to invite participation from biomass developers to identify potential improvements to the Guidebook that will help increase the utilization of biomass resources.

Pioneer appreciates the opportunity to provide these comments looks forward to working with the Commission to address these issues.

Sincerely,

/s/ Sam Kang

Sam Kang  
Chief Operating Officer  
Pioneer Community Energy  
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<sup>2</sup> See D.21-06-035 at 84.

<sup>3</sup> Bailey, Stephanie, Jennifer Campagna, Mathew Cooper, Quentin Gee, Heidi Javanbakht, and Ben Wender. 2023. 2023 Integrated Energy Policy Report. California Energy Commission. Publication Number: CEC-100-2023-001-CMF at 15.

<sup>4</sup> Sarah E. Baker, Joshua K. Stolaroff, George Peridas, Simon H. Pang, Hannah M. Goldstein, Felicia R. Lucci, Wenqin Li, Eric W. Slessarev, Jennifer Pett-Ridge, Frederick J. Ryerson, Jeff L. Wagoner, Whitney Kirkendall, Roger D. Aines, Daniel L. Sanchez, Bodie Cabiyo, Joffre Baker, Sean McCoy, Sam Uden, Ron Runnebaum, Jennifer Wilcox, Peter C. Psarras, Hélène Pilorgé, Noah McQueen, Daniel Maynard, Colin McCormick, *Getting to Neutral: Options for Negative Carbon Emissions in California*, January, 2020, Lawrence Livermore National Laboratory, LLNL-TR-796100, at 5, available at: [https://gs.llnl.gov/sites/gf/files/2021-08/getting\\_to\\_neutral.pdf](https://gs.llnl.gov/sites/gf/files/2021-08/getting_to_neutral.pdf).