

Cogeneration Ash Council

"Dedicated to the Generation of Clean Energy"

December 11, 2006

Jeffery D. Byron
Commissioner and Presiding Member
Electricity Committee
California Energy Commission
1516 Ninth St.
Sacramento, Ca. 95814

DOCKET

06-OIR-1

DATE DEC 11 2006

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Docket No. 06-OIR-1

Dear Commissioner Byron:

The following presents the comments of the Cogeneration Ash Council (CAC) relative to the proceeding to implement the SB 1368 Performance Standard (Docket No. 06-OIR-1). The CAC consists of 6 fluidized bed cogeneration facilities located from Stockton south to the Mohave Desert. The facilities are fueled with a blend of coal, petroleum coke, and in the case of two of the facilities, Tire Derived Fuel (TDF).

The member cogeneration facilities provide steam to enable thermally enhanced oil production, for use at the Port of Stockton, and for agricultural processes. The steam is a necessary component for all of the processes and, if produced separately from the existing cogeneration facilities, would result in the emission of substantial amounts of CO₂. Further, if petroleum coke currently utilized as a portion of the fuel blend in these facilities were to no longer be an acceptable fuel source in California, it would be shipped to energy facilities in China and other emerging countries having much less stringent emissions standards. Additionally, the two facilities utilizing TDF dispose of approximately 2 million passenger tire equivalents per year that would otherwise be disposed of in landfills. The utilization of TDF was encouraged, and in some cases funded, by the Integrated Waste Management Board.

The ash produced from cogeneration is utilized beneficially for a number of products and processes encouraged by the Integrated Waste Management Board and the Water Resources Control Board.

Therefore, we request that any Emissions Performance Standard be developed to allow California advanced coal/petroleum coke-fired cogeneration technologies to meet that standard. We believe processed steam produced in these facilities should be provided a substantial Btu equivalent credit. Finally, we believe the definition of "Waste Fuels" should be the subject of a separate workshop in an effort to develop a "credit" for qualifying facilities.



Thank you for the opportunity to comment and participate in this important proceeding. If you or your staff have any questions please let me know.

Sincerely,



Donald Waln
President

C: James D. Boyd
Energy Commission Vice Chair
John L. Geesman
Commissioner and Associate Member
Electricity Committee