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March 14, 2007

Chair Jacqueline Pfannenstiel
Vice Chair James Boyd
Commissioner Arthur Rosenfeld
Commissioner John Geesman
Commissioner Jeffrey Byron
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Renewables Portfolio Standard Eligibility Guidebook (2nd Ed.)


Dear Commissioners:

BioEnergy Solutions, LLC appreciates your efforts to update the CEC's Renewables Portfolio Standard (RPS) Guidebook to allow direct injection of biogas into natural gas pipelines to qualify as part of the RPS program and offers a comment for your consideration. Whether the point of injection is within the WECC or not should not matter, since the WECC is an electric grid that is not physically related in any way with the natural gas pipelines that supply electric generation in California. Biogas injected into natural gas pipelines should be approved as a renewable substitute for natural gas to the extent it meets the Guidebook's quality standards and is used by a CEC-certified RPS eligible generating facility. In which case, pipeline biogas capable of being sourced from wherever natural gas transported in pipelines is sourced. BioEnergy recommends the following language change to page 30 of the Committee Draft:

- (a) The term "transportation" should be substituted for the term "transmission" each time it is used at page 30.
- (b) 2. The gas must be injected at a point within the ~~WECC region~~, into a natural gas transportation transmission pipeline system that delivers gas into California.

Thank you for this opportunity to provide comment.

Sincerely,



Donald C. Liddell

DCL/md