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The following comments are submitted to the 2009 IEPR- Feed-in Tariffs, Docket No. 08-IEP-1 and Docket No. 03-RPS-1078. The report by Kema Inc. "Exploring Feed-in Tariffs for California" (CEC300-2008-003-D), identifies eligibility requirements that renewable energy resources must pass in order to receive the feed-in tariff rates. They mention on page 13: "resource type, vintage, location, interconnecting utility, and project size." I would like to recommend an additional criterion for eligibility, sustainable practices that are based on environmental and development principles. I have recently been working, with the Board of Directors of the California Biomass Collaborative on a certification, incentives, and market development for a sustainable biomass industry. For that group the principles are: greenhouse gas balance, carbon sinks, existing food supplies, biodiversity, land availability, water availability, air quality, local economic development, social well being of employees and transparency to the public. Most of these principle should be applied to the entire renewable energy venue.

Chapter 8, page 45 of the Kema report states: "California policy makers should decide up front what is and what is not included in a feed-in tariff." It is my recommendation that environmental and development principles should be included in feed-in tariff. The Bureau of Land Management seems to have this concept in mind as they are planning an

“extensive environmental study” on large solar plants being placed on public land. (Source Dan Frosch, D., 2008, Citing Need for Assessment, U.S. Freezes Solar Energy Projects.” June 27, 2008). Another example, New Hampshire’s RECs planning, has placed a moratorium on combustion of C & D (Construction and Demolition) wastes to fuel energy projects (Source; Greer, D., Financing Wood-Fired Generation Facilities, Biocycle, February, pp: 39).

Cramer, et. al., has proposed a set of environmental principles for biomass. (Source: Cramer, J., et. al., 2006, Testing Framework for Sustainable Biomass, Final Report from the Project Group, Sustainable Production of Biomass, Creative Energy, Energy Transition, [http://www.lowcyp.org.uk/assets/reports/o70427-cramer-finalReport\\_En.pdf](http://www.lowcyp.org.uk/assets/reports/o70427-cramer-finalReport_En.pdf), pp: 2,10.) I have expanded on this set of principles to include market development principles in a recent paper (Matteson, G. C., 2008, Certification, Incentives, and Market Development for a Sustainable Biomass Industry, Elsevier, Publication under review JEP0-D-07-00742). Others have proposed principles including the 25X’25 by America Energy Future (Source: 25 X’25 Sustainable Principles, America’s Energy Future, March 2008), and the Roundtable on Sustainable Biofuels (Source: Opal, C., 2008, Roundtable on Sustainable Biofuels, An initiative of the EPFL Energy Center, Ecole Polytechnique Federale de Lausanne, <http://EnergyCenter.epfl.ch>).

Chapter 12, page, of the Kema report states: “various forms of credit or security requirements can be imposed to protect against the risk of a new project not going forward or non-performing. I would like to have the Energy Commission focus on certification and compliance in the design the credit or security requirements. In addition to defining the principles for standards-in-practice, I have also developed a measurement and certification system with compliance features for the biomass industry. (Source: Matteson, G.C., 2008, above). The U.S. Forest Service has also developed a similar system for gaining compliance with USDA Forest standards-in-practice (Source: USDA, Forest Service, 2004, Health Forest Restoration Act, U.S. Forest Service, FS-7999, <http://www.fs.fed.us/projects/hfifield-guide/documents/haz-fuel-cver/pdf>). Again, these certification and compliance features should be applied to all renewable energy resources.

I agree with Kema report, a feed-in tariff should be open only to resources and technologies meeting defined eligibility standards. A feed-in tariff incentive should only be available to renewable energy producers that employ standards-in-practice which are based on the environmental and development principles.