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December 14, 2010

James Boyd, Vice Chair
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-ALT-1
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

10-ALT-01

DATE	DEC 14 2010
RECD.	DEC 14 2010

Subject: Comments on 2011-2012 Investment Plan, Docket Number 10-ALT-1

Dear Commissioner Boyd:

CR&R Incorporated appreciates this excellent Final Draft 2011 Bioenergy Action Plan. CR&R's interest and expertise is in the production of biogas from the organic fraction of the municipal waste stream using anaerobic digestion and gas clean up technology to convert the biogas to Renewable Natural Gas (RNG) otherwise known as biomethane. CR&R believes that the draft, with very few modifications, is a realistic and well considered guidance document for California.

We concur with the reference on page 13 of the draft that AD facilities are likely to be developed across the state to meet the increasing need to divert organic materials from landfills. While the report justifiably references the production of RNG from landfill gas and does touch on the prospects for RNG development at MRF/Transfer stations we believe that the co-location of AD facilities at MRF transfer stations and composting facilities is a potentially equally important nexus for RNG development from municipal waste and should be stated as such. The City and County of Los Angeles, among other local government entities have shown a strong interest in the development of projects that make the MRF/Transfer/RNG connection.

Presently there is a cost gap between landfill pricing, especially in Southern California, and the development costs of AD projects like CR&R's that tap the organic fraction of the waste stream to produce RNG. This gap will initially have to be bridged with a combination of grant funding, the incentives provided by the low carbon fuel standard and other inducements. In our view very close interaction between the PUC, CEC, ARB CalRecycle and the AQMD is essential to advancing RNG in our state. For example, AQMD and the Air Resources Board's grants for fueling infrastructure and alternative fueled heavy duty trucks could play an important role in the development of an RNG infrastructure in the years ahead.

We appreciate your work, and we look forward to participating in the implementation of the 2011 Action Plan.

Sincerely,

Paul Relis
Senior Vice President
CR&R