

**Docket Optical System - GTI Comments for the 2011 "Bioenergy Action Plan" - Docket Number10-BAP-01 December 29, 2010**

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**To:** CEC Docket Unit <docket@energy.state.ca.us>  
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The following comments are submitted on behalf of the Gas Technology Institute:

As California continues its push toward aggressive new renewable energy and air quality/greenhouse gas reduction goals, GTI would like to offer some comments on the Bioenergy Action Plan (Plan). The draft final Plan is thorough, well written, and ambitious. GTI applauds your hard work and looks forward to helping in any way to achieve the goals set forth in the Plan.

GTI believes California can be a leader in utilization of renewable natural gas by ensuring that pipeline quality bio-gas produced within and outside of California can be utilized to meet both the state's RPS and LCFS goals, and that the rules regarding direct pipeline transference be lifted. Renewable bio-gas should be treated like renewable electrons placed into the electric grid, so that once the renewable pipeline quality bio-gas is injected into an interstate, intrastate or utility pipeline system anywhere in the nation, it should be available for purchase in California. This would eliminate the need to track it through the rest of the delivery system. California regulators should simply verify the amount, quality and life cycle analysis (based on production process) of the fuel as it is placed into the nearest pipeline system for "virtual" transfer to CA.

This approach is scientifically sound and congruent with the goals of the State of California by creating the largest amount of carbon emission reductions and the greatest production of renewable fuels. In addition, if the regulators in California want to ensure home-grown California renewable natural gas energy projects, one approach would be to provide additional state grants, incentives and regulatory reforms. Many of these issues have already been addressed in the Plan, and we certainly support those recommendations.

Renewable natural gas provides flexibility in that it can have a major role in helping to meet the State's renewable goals for electricity and transportation fuels and provides a lower cost option than many other renewable alternatives. Renewable natural gas can also work to de-carbonize residential and commercial natural gas heating applications in a very cost-effective manner.

Additionally, the prohibition on landfill gas to pipeline-quality biogas for injection into the California natural gas grid should be lifted. There are adequate controls available to ensure that this gas is safe and environmentally benign.

Thank you for the opportunity to share our thoughts on the record. If you have any questions, please contact me using the information below.

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