

March 19, 2012

The California Energy Commission California Energy Commission Dockets Office, MS-4 Re: Docket No. 11-RPS-01 and Docket No. 02-REN-1038 RPS Proceeding 1516 Ninth Street Sacramento, CA 95814-5512



Subject: Biomethane to Pipeline RPS Eligibility, "Docket numbers 02-REN-1038 and 11-RPS-01" and "RPS Proceeding"

Dear Sirs:

An accounting procedure needs to be established to protect rate payers of California from fraud through production and use of renewable natural gas (RNG) and electricity as they pertain to the Renewable Portfolio Standard (RPS) eligibility. This said the World has one atmosphere and chemically there is no difference between a molecule of RNG and petroleum based natural gas.

The State of California needs to do all it can to encourage production and use of RNG Worldwide, not just in California, the United State or the Americas. Green House Gasses (GHG) released to the atmosphere in Asia have the same impact on California as GHG released here in California.

California and the United States have insufficient electric and natural gas infrastructure. Not only are these systems undersized, they are aging and in need of replacement. It is absurd to utilize critical infrastructure dollars for construction and maintenance of parallel natural gas and electric conveyance facilities in an effort to keep identical renewable energy sources separate from conventional sources.

Establishment of an aggressive accounting procedure regarding production, distribution and use of renewable energies is good for the California economy, and environment. We ask the CEC do all it can to encourage production and use of renewable energy worldwide.

Sincerely,

George Gitschel

CEO/Director of Marketing and Business Development

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