

March 23, 2012

California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Comments to the California Energy Commission

RPS Proceeding 02-REN-1038 and 11-RPS-01

Notice to Consider Suspension of the RPS Eligibility Guidelines Related to Biomethane

Thank you for providing The Climate Trust with the opportunity to submit comments to the California Energy Commission on the RPS Proceeding. The Climate Trust recognizes that the CEC is entrusted with ensuring environmental integrity of the RPS and providing consistent rules for investors to expand renewable projects that meet the rules of the RPS and SBX1-2 legislation.

The Climate Trust is a nonprofit organization with a mission to provide expertise, financing, and inspiration to accelerate innovative climate solutions that endure. The Climate Trust was established in 1997 in response to the United States' first regulation of greenhouse gases (GHG) under the Oregon Carbon Dioxide Standard. We work with regulated utilities, agribusiness, and governments to expand financing for projects that significantly reduce greenhouse gas emissions. During our 15 years of investing, we developed a \$20M portfolio of high quality GHG reduction projects that includes biomethane projects in several states.

The Climate Trust urges the Commission to avoid a wholesale moratorium on all pipeline injection of biomethane.

There are existing and planned biomethane projects that meet all of the following characteristics and therefore should not be included in any proposed moratorium.

- Projects that clearly meet the requirements of the California RPS regulation and rules
- Projects that have accurately metered, quantifiable and verifiable attributes under the SBX1-2 legislation

We encourage the CEC and California legislature to develop a positive list of eligible project types that includes anaerobic digestion projects that enable the delivery of biomethane through a direct pipeline connection. One such project exists at a leading dairy operation in Riverdale California, but there are many such existing and planned projects. These agribusiness projects improve farmer livelihoods, generate new jobs, deliver renewable energy, reduce greenhouse gas emissions and provide other environmental co-benefits in California. The currently proposed wholesale moratorium would immediately halt these projects; many of these anaerobic digester projects, and the essential climate and economic benefits they provide, simply will not occur without the ability to inject biomethane into the pipeline.

Thank you for the opportunity to submit these comments.



Ben Vitale
President
The Climate Trust