



Bay Area Biosolids to Energy
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March 13, 2013

California Energy Commission DOCKETED 12-ALT-02 TN # 69924 MAR. 14 2013

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

RE: DOCKET No. 12-ALT-2

SUBJECT: COMMENTS ON THE “2013-2014 INVESTMENT PLAN”

To the California Energy Commission:

Thank you for the opportunity to comment once again on the 2013-2014 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program (2013-2014 Investment Plan). In our comments, submitted December 10, 2012, we urged the California Energy Commission (Commission) to increase funding for alternative fuel production, and to allocate funds for biosolids-to-energy fuel production. We were discouraged to see that these recommendations were not incorporated in the most recent staff draft of the 2013-2014 Investment Plan.

As we noted in our previous comments, the Bay Area Biosolids to Energy Coalition (Coalition) is comprised of 19 public agencies whose wastewater treatment activities produce a reliable feedstock of energy rich biosolids. Currently, most biosolids that originate in the Bay Area are hauled hundreds of thousands of miles to be disposed of in landfills or by direct land application. Our goal is to harness the energy in these biosolids locally; eliminating the need to transport them over a great distance, which causes pollution and greenhouse gas (GHG) emissions, and reducing the carbon footprint associated with our water treatment activities. Our Coalition has identified several technologies with the potential to produce renewable, alternative vehicle fuels including “clean diesel”, hydrogen fuel, and fischer-tropsch liquids that can be used as fuel additives to reduce emissions.

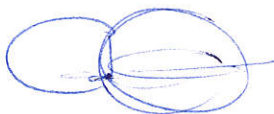
Our Coalition appreciates the Commission's continued commitment to expanding alternative fuel production in California. However, we believe more work should be done in the 2013-2014 Investment Plan to encourage investment in biosolids-to-energy projects. Biosolids are a reliable 24/7 feedstock produced across California. Investments in facilities that produce alternative fuels from this feedstock will reduce GHG emissions, and take advantage of a little used renewable feedstock.

We believe the Commission's 2013-2014 Investment Plan should encourage investments in these facilities by increasing funding for alternative fuel production and allocating a portion of those funds for biosolids-to-energy projects specifically. We appreciate that the \$23 million for alternative fuel production currently contemplated in the Investment Plan represents the largest funding category. However, the lack of sub-categories or specific funding allocations increases the potential for some fuel types to be overlooked. Again, we suggest that a certain amount of funding be specifically directed for construction of biosolids-to-energy projects.

We further recommend that the Commission issue a solicitation specifically targeted to alternative drop-in fuels rendered from biosolids. Investments in the facilities discussed above are capital intensive and likely cost prohibitive for the publically owned utilities producing biosolids. As such, state investment in these facilities is critically important to deploying these technologies.

We thank you again for the opportunity to comment on the 2013-2014 Investment Plan.

Sincerely,



Caroline Quinn
Engineering Services Director
Delta Diablo Sanitation District
Program Manager, BAB2E Coalition

CQ:clk

cc: BAB2E Coalition Members
Mike Robson, EGRS
District File P.10089.03.04
Chron File