

## Chapter 3 Bioenergy Status and Issues

**Biomethane Production (page 64-72)**Page 65

According to the U.S. EPA's Landfill Methane Outreach Program (LMOP), there are 621 operational landfill-to-energy projects in the U.S. representing 1,978 MW and 331 mmscfd.<sup>1</sup> Due in part to the considerable investment required to build an RNG project, only 38 of these projects (6.2%) have been developed to produce pipeline-quality RNG nationally. Additionally, there are 450 candidate landfills identified by LMOP, representing 850 MW, 470 mmscfd, and 36 MMT CO<sub>2</sub>e/yr, which have not been developed.<sup>2</sup>

Even if only half of the candidate landfills identified by LMOP in California are developed for High Btu purposes, it will double the number of High Btu projects that currently exist nationwide.

Page 68, footnotes

97 Assembly Bill 341 (*Hasbro*, Chapter 476, Statutes 2011)

Please change “Hasbro” to “Chesbro”.

Page 69, paragraph 4

“Biogas production facilities produce relatively small quantities of methane...”

We believe this statement is inaccurate, and potentially misleading. High Btu Facilities are not developed to to produce methane. Rather, they are developed to capture methane that would otherwise escape as fugitive emissions or be flared. The amount of methane captured, treated and used thereafter (whether for electric power generation, thermal heat or transportation fuel) is proportionate to the amount of methane produced at the source site (landfill, wastewater treatment facility, digester, etc.).

Page 70, paragraph 5

“Pipeline safety is another issue for biomethane. Utilities have said that it is imperative to monitor and test biomethane going into their pipelines. While utilities have experience injecting biomethane into their pipelines, they still lack data, especially for interconnections into low- demand pipelines.<sup>107</sup> Some of the utilities also feel that lowering the 990 BTU per cubic foot minimum gross heating value requirement could potentially threaten the pipeline as it goes against standards set by the CPUC.”<sup>108</sup>

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<sup>1</sup> LMOP landfill and project database, U.S. Environmental Protection Agency. <http://www.epa.gov/lmop/projects-candidates/index.html#map-area>.

<sup>2</sup> Id.

Investor-owned utilities (IOUs) should be distinguished here from Public-owned utilities (POUs). The IOUs are the only utilities that have objected at any point to injecting biomethane into the existing common carrier pipelines. The POUs do not object, and have been the largest customers for producers of biomethane, as biomethane can be procured for long-term contracts at stable pricing, and the commodity can be stored.

It should also be noted that the 990 Btu minimum heating value required and related concerns cited by SoCalGas (Rule 30) and PG&E (Rule 21) are an anomaly throughout the industry and nation. Producers of biomethane are accustomed to meeting a minimum heating value requirement that ranges from 950 - 975 Btu, and have done so for over 30 years in nearly every state, except California.

## Page 72

As it relates to Recommendations for Biomethane, please see slides 22-30 in the attached Coalition Presentation to the Joint IEPR-Transportation Lead Commissioner's Workshop regarding Recommendations for Government Action.

## Chapter 8 Transportation Energy

### **Recommendations**

## Page 202

As it relates to Recommendations, please see slides 22-30 in the attached Coalition Presentation to the Joint Commissioner's IEPR-Transportation Workshop regarding Recommendations for Government Action. Please also see the attached letter to Commissioners Scott and McAllister, articulating the same challenges, opportunities and recommendations.