



DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

1001 I STREET, SACRAMENTO, CALIFORNIA 95814 • WWW.CALRECYCLE.CA.GOV • (916) 322-4027

P.O. BOX 4025, SACRAMENTO, CALIFORNIA 95812

October 29, 2013

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 13-IEP-1A
1516 Ninth Street
Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED
13-IEP-1A**

TN 72321

OCT. 31 2013

Via Email: docket@energy.ca.gov

Subject: Draft 2013 IEPR

Dear Stephanie Bailey:

CalRecycle appreciates the opportunity to review and comment on the Draft IEPR and offer the following comments which are intended to help clarify and further improve the report.

CalRecycle Comments:

1. Table 2, page 55 - Text indicates that biomass is small/limited resource but it appears that this statement is also applicable for geothermal, wind, wave, and small hydro which all have a limited resource potential relative to solar. Text should be revised so it accurately reflects the resource potential as presented in Table 2.
2. Page 57, last 2 lines –
 - a. Please clarify what “efficient and environmentally friendly technologies” are referenced.
 - b. Re: statement that private financiers seek a high rate of return on unproven technologies, does CEC consider Anaerobic Digestion (AD) to be unproven? If so, then the Draft IEPR should describe what about AD is unproven – unproven in California, unproven for certain feedstocks, or certain AD processes? Have the experiences with AD in Europe been evaluated and considered in reaching this finding?
3. Top of Page 65 – the Draft IEPR should be amended to include municipal solid waste as a source of biomass feedstock.



4. Page 68, last paragraph on CalRecycle goals. Last ½ of paragraph should be amended to include mention of CalRecycle Recycling Market Development Loans, CEC AB 118 grants for low carbon fuel production as a number of awards have gone to AD facilities using organics as feedstock, and the 2013 update to the AB 32 Scoping Plan which calls for more AD of organic waste to achieve GHG reductions.

5. Page 72 – CalRecycle supports the recommendation and would suggest referencing the ARB/OEHHA AB 1900 Report to CPUC that specifically called out the need for data on AD biogas. We would also suggest recommending additional research for development of smaller scale biogas conditioning technologies.

6. Table 17, page 191 – the Draft IEPR contains an estimate that 4 Millions of Gallons - GGE of biomethane will be produced or consumed in-state by 2020. Are the assumptions and analysis that support this estimate available for review? CalRecycle is particularly interested in the projections for in-state biomethane production, including the type and quantity of feedstocks that will be utilized for biomethane production.

If you have any questions, please do not hesitate to contact me directly at (916) 341-6488.

Sincerely,

A handwritten signature in black ink, appearing to read 'Clark Williams', with a long horizontal flourish extending to the right.

Clark Williams
Manager, CalRecycle

Cc: Stephanie Bailey, IEPR author
Stephanie.Bailey@energy.ca.gov