



Bay Area Biosolids to Energy
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California Energy Commission

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13-ALT-02

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November 13, 2013

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

RE: DOCKET No. 13-ALT-02

SUBJECT: COMMENTS ON THE 2014-2015 INVESTMENT PLAN UPDATE

To the California Energy Commission:

Thank you for the opportunity to comment on the Staff Draft of the 2014-2015 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (2014-2015 Investment Plan).

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. The transport of these biosolids results in pollution and greenhouse gas (GHG) emissions. Our goal is to harness the energy in these biosolids locally; eliminating the need to transport them over a great distance, thus reducing the carbon footprint associated with our water treatment activities. Our coalition is currently considering technologies that could produce renewable energy from biosolids. At least one of these technologies could produce renewable, alternative vehicle fuel as well.

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 2014-2015 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.

Coalition members: Central Marin Sanitation Agency; City of Burlingame; City of Livermore; City of Millbrae; City of Richmond; City of San Jose; City of Santa Rosa; Delta Diablo Sanitation District; Dublin San Ramon Services District; Fairfield-Suisun Sewer District; Ironhouse Sanitary District; Palo Alto Regional Water Quality Control Plant; San Mateo County Sanitation District; San Francisco Public Utilities Commission; Sausalito Marin City Sanitary District; South Bayside System Authority; Union Sanitary District; Vallejo Sanitation & Flood Control District; West County Wastewater District

The Staff Draft of the 2014-2015 Investment Plan proposes to allocate \$20 million to alternative fuel production and supply. This is \$3 million less than the \$23 million allocation in the 2013-2014 Investment Plan. We urge the Commission to expand its investment in alternative fuel production to help bring valuable technologies to market. We also suggest that a certain amount of funding be specifically directed for construction of biosolids-to-energy projects.

Finally, we recommend that the Commission issue a solicitation specifically targeted to alternative drop-in fuels rendered from biosolids. Construction of biosolids to energy facilities is 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.

Sincerely,

A handwritten signature in blue ink that reads "Paul Kelley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Paul Kelley
Executive Director