



November 18, 2013

The Honorable Robert Weisenmiller, Chair  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Investment Plan Update for AB 118 Program (Alternative and  
Renewable Fuel and Vehicle Technology Program)**

Dear Chairman Weisenmiller:

Harvest Power Inc. would like to express our support for the Alternative and Renewable Fuel and Vehicle Technology Program and California's efforts to stimulate production of biofuels from organic waste. We are concerned, however; that the Investment Plan Update recommends a reduction of funds to this category.

Harvest Power knows firsthand the value of the ARFVT program having been the recipient of two awards for a project in Tulare. This facility will convert the region's organic waste into the equivalent of 660,000 gallons of gas annually, reducing greenhouse gas emissions by almost 6,000 metric tons of CO<sub>2</sub>e per year. It is unlikely this project would have moved forward were it not for the ARFVT funding.

The California Air Resources Board has certified biofuel from organic waste as **carbon negative**, the only type of fuel to be so designated. Furthermore, these projects advance several other state environmental priorities such as waste diversion. With assistance from the ARFVT program, digesters can offer waste generators, such as farms, municipalities and food processors, an economic disposal option, while also contributing to the state's supply of renewable biofuel.

It is also important to recognize the typical size of anaerobic digester facilities does not meet the 15 million gallons per year threshold of recent solicitations. As mentioned, Harvest's facility is approximately 4% of that size and yet requires 40,000 tons of organic waste per year. To reach 15m gallons would require 1m tons per year; a simply unattainable amount for a single facility.

Organic material recycling can play an important role in helping California achieve several of the state's sustainability goals. We urge the Commission to restore funding levels and reconsider minimum production requirements on organic waste projects.

Thank you,

Wayne Davis  
Vice President of Government Affairs