



California Energy Commission

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November 21, 2014

Dockets Unit
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: 2015 – 2016 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

The California Compost Coalition (CCC) is a statewide organization representing operators of composting and anaerobic digestion facilities involved in the processing of green and food waste materials derived from municipal solid waste throughout California. On behalf of these companies, we attended the November 12, 2014, workshop.

The CCC supports the comprehensive and forward-looking approach taken by the CEC, including funding for shorter-term GHG reductions that can be provided by biomethane. Renewable natural gas derived from organic waste is carbon negative, and one of the lowest carbon intensity transportation fuels available. Although a young technology, biomethane fuel facilities are being commercialized in California and can provide immediate and significant reductions in transportation fuel carbon intensity. The CCC is also supportive of the investments in natural gas vehicle technology, which can also utilize renewable natural gas interchangeably with fossil-based natural gas.

The CCC encourages the CEC to consider restricting eligible feedstocks for biomethane to pre-landfilled biomass sources. Placing biomass resources in landfills is an inefficient practice to produce and collect biomethane in 30 years instead of 30 days. The focus of California policy is to divert organic materials from landfill disposal, particularly in light of AB 341, which specifies a goal of 75% of solid waste generated being source-reduced, recycled or composted (including anaerobic digestion), and that the increased diversion of organics from landfilling is identified as the necessary step to achieve that goal. In that light, it seems counter-productive to invest in landfill-based projects that will see a reduction in organic inputs to satisfy California's clearly expressed policy goals. Additionally, the California Air Resources Board has identified landfills as a significant source of anthropogenic methane emissions.

CCC members are developing distributed renewable transportation production facilities, following the distributed electrical generation model. CCC members are co-locating anaerobic digestion facilities at their material recovery facilities and compost facilities, and at locations where their fleets are parked, and matching fuel production capacity to local demand, as technology is commercializing in a modular small-scale fashion.

We appreciate the opportunity to comment on the Investment Plan Update and look forward to working with you in the future to reduce the carbon intensity of California's transportation fuels.

Should you have any questions, please contact me at (916) 739-1200.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil S.R. Edgar". The signature is fluid and cursive, with the first name "Neil" being more prominent.

Neil S.R. Edgar
Executive Director