camco

DOCKET	
11-RPS-01	
DATE	MAR 22 2012
RECD.	MAR 22 2012

March 22, 2012

Mr. Robert B. Weisenmiller, Ph.D
Chairman
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: RPS Proceeding, Docket Numbers 02-REN -1038 and 11-RPS-01: Notice to Consider Suspension of RPS Eligibility Guidelines Related To Biomenthane

Dear Chairman Weisenmiller:

This letter articulates Camco's concerns regarding the California Energy Commission's (CEC) consideration for a suspension of the RPS eligibility of biomethane. There are many arguments regarding jobs and lost opportunities that will come as a result of this moratorium and we agree with many of those points. Our most significant concern relates to the impact the moratorium would have on companies that have invested several years and millions of dollars in CA. The moratorium removes all the market drivers that currently justify efforts in the state and could force companies to abandon the investments that have been made to date setting the industry back indefinitely. Camco is a global developer of clean energy projects and is a publically listed company on the London Stock Exchange (LN:CAO). We build, own and operate projects that supply clean renewable energy and eliminate waste streams. We operate the largest manure based anaerobic digester in the US (Idaho: 4.5MW) and are the largest US manager of GHG mitigating anaerobic digestion projects listed with the Climate Action Reserve (CAR).

Camco and numerous other companies have invested many years and millions of dollars into the development of clean energy projects in and related to the CA markets. This moratorium may cause the biomethane industry to abandon CA, many developers to lose years of effort and capital invested in projects. It will also reduce the economic and environmental benefits for CA residents. Camco would like to continue focusing on projects in CA relating to CA's RPS and clean energy initiatives but the moratorium would make it unlikely that we could continue to justify the effort and we are confident several other companies share this view. Camco trusts that you will take these issues into consideration when you review the moratorium.

Sincerely,

Andy Dvoracek
VP- Biogas Development
Camco International Group, LLC

CC:
Carla Peterman, Commissioner
Karen Douglas, Commissioner
Steven Bradford, Assembly member, 51st District

Wesley Chesbro, Assembly member, 1st District
Nancy Skinner, Assembly member, 14th District
Darrell Steinberg, Senate President Pro Tempore
John A. Perez, Speaker of the Assembly
Gareth Elliot, Office of the Governor
Cliff Rechtschaffen, Director, California Department of Conservation
Carroll Mortenson, Director, CalRecycle
John Laird, Secretary of Natural Resources
Scott Smithline, Assistant Director, CalRecyle
Mark Kootstr
Kate Zocchet

Camco International Group, Inc.
9360 Station Street, Suite 375, Lone Tree, USA, CO 80124
Incorporation number 4406963