HB Homeland Biogas energy
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March 23, 2012

Chairman Robert B. Weisenmiller, Ph.D.
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 Biomethane

Dear Chairman Weisenmiller:

We are deeply concerned about the Commission's consideration of a suspension of the RPS eligibility guidelines related to biomethane. Homeland Biogas Energy (HBe) develops, builds, owns and operates Anaerobic Digesters (AD) to produce biogas and biomethane, and has been actively developing multiple AD projects in California in cooperation with local Dairies. This has included a substantial financial investment in the State with the projected creation of local "green" jobs and locally sourced renewable energy.

In addition to locally sourced baseloaded renewable energy, these California AD projects provide multiple benefits, including key environmental benefits to the State and the dairy industry. The moratorium, if enacted, will cause our California biomethane projects to come to a complete halt. The moratorium, along with the associated regulatory uncertainty, will have a long-term effect on the California biomethane market and may cause our California projects to be halted permanently.

Respectfully, we ask that the Commission dismiss the request for an immediate wholesale moratorium on biomethane RPS eligibility, and defer to the Legislature for action to further clarify future RPS eligibility conditions for biomethane. The proposed moratorium is bad for California, bad for the State's economy and bad for the environment. We strongly urge you to reconsider this moratorium and keep the California biomethane businesses in business.

Sincerely,

Paul Kelso

Paul Kelso
VP, Business Development
Homeland Biogas Energy

Cc: Carla Peterman, Commissioner
Karen Douglas, Commissioner
Darrell Steinberg, Senate President Pro Tempore
John A. Perez, Speaker of the Assembly
Gareth Elliot, Legislative Affairs Secretary, Office of the Governor