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An employee owned company

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Robert B. Weisenmiller
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

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

Subject: **2,000,000 man hours of employment lost**

Dear Sir:

In the interests of brevity I assembled economic data that quantifies what I understand to be unintended consequences to a decision that would suspend RPS eligibility guidelines related to biomethane. Here is an example I am familiar.

My companies are part of an enterprise working in the biomethane waste to energy space in California. In particular, we have invested years of development and engineering effort toward the production of pipeline quality natural gas produced from manure.

As luck would have it, we are poised to begin a multi- phase, multi- dairy project that will produce pipeline quality natural gas from more than 123,000 milking cows starting in first quarter 2013. The impact of the proposed changes in the "RPS Eligibility Guidelines Related to Biomethane" will kill that project and, in kind, will eliminate employment opportunities for construction, professional and service workers for an **entire generation of some 50 families** when measured by the direct employment impact of this single project. However, as this work represents an employment base working in a primary industry, the economic impact of this primary industry to California families will provide a multiplier of 8 to 10 times the base impact, i.e..... **Full time saving wage jobs will be lost for 500 families for 25 years.**

I can think of better things to eliminate in today's marketplace than biomethane production when used for baseline energy needs. It seems like a bad idea to forfeit waste to biomethane utilization when we now know the consequence of ignoring the science and the economics of such a decision. I ask you to consider the question before you in its entirety before making a decision that could create so many negative consequences to so many for so long.

Respectfully,

RE Kinghorn

R E Kinghorn
President