August 17, 2012

California Energy Commission
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ELECTRONIC MAIL

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

SUBJECT: DOCKET NO. 12-EPIC-01

Dear Commissioners and Staffs:

Thank you for the opportunity to provide comments on the first triennial investment plan for the Electric Program Investment Charge (EPIC). These comments are submitted on behalf of the Bay Area Biosolids to Energy (BAB2E) Coalition.

The BAB2E is comprised of 18 public agencies representing a population of over 4 million, seeking to maximize the use of biosolids from our wastewater treatment process as a renewable energy resource and to reduce greenhouse gas emissions associated with biosolids management. The wastewater treatment processes our agencies utilize produce useful byproducts such as biosolids and biogas that are and can increasingly be used as a steady and reliable source of fuel for renewable energy production. Biosolids from the wastewater treatment process, produced 24/7, have significant potential to help California meets its RPS goals. Wastewater agencies across the state are in the process of developing and implementing renewable energy projects. These projects will provide a foundation for the distributed generation that will be needed in California to reach RPS goals.

A 2009 Staff Paper from the California Energy Commission noted that progress towards meeting California's ambitious bioenergy goals has been slow, and in some cases, the State is losing ground. Electricity generated from biomass fuels actually decreased from 2002 to 2008; while the State's total electricity generation and demand has increased. Meeting California's 33 percent RPS goal and the 2010 biopower targets will require substantial additional biopower generation annually assuming that total electricity consumption in 2010 will remain the same as in 2008. California wastewater treatment agencies generate significant biosolids. The Bay Area alone generates over 158,000 dry metric tons of biosolids annually. These biosolids have energy value that can help California meet its clean energy goals, including RPS goals, AB 32 goals and clean transportation fuel goals. Policies and funding to develop biosolids as a clean energy resource will enable California wastewater treatment plants to tap into this underutilized resource, significantly expand biomass-powered generation capacity and alternative vehicle fuels, and help California meet its clean energy goals as well as its goal of 50% diversion of organic waste from landfills by 2020.

Funding for renewables and research development, and demonstration purposes should be included in the EPIC investment plan in order to help the state develop clean renewable energy. Despite the energy value in biosolids, there are challenges to the use of conversion technologies and bringing those technologies to market. Investigating new technologies to fully utilize biosolids is essential to address the challenges and it is essential that funds be made available to help deploy these new technologies, when proven, on a commercial scale. Similar to other emerging alternative energy technologies, the shift to bring biosolids to energy technology to a commercial scale and make it accessible for wide use across the country depends on a combination of federal, state, local, and private partnerships.

In order to fully develop California's renewable energy resources to meet RPS goal, clean energy, clean transportation fuel, and AB 32 goals, funding for technology research and development to generate energy from biosolids from publicly owned wastewater treatment facilities is essential, as is funding for commercial scale deployment of these and other technologies. The Bay Area Biosolids to Energy (BAB2E) Coalition respectfully urges the inclusion of funding for biosolids to energy in the EPIC investment plan.

Sincerely,

Caroline Quinn
Engineering Services Director
Delta Diablo Sanitation District
Project Manager, BAB2E Coalition

CQ:clg

cc: District File P.10089.03.04
Chron File