

Thank you for the opportunity to provide comments on the EPIC draft and for including Sierra Energy on the recently held workshop permitting panel. Sierra Energy's experience during the permitting and planning processes, including of our recent SacPort BioFuels project, have been positive and we were glad to have the opportunity to share our experience and be a part of the EPIC discussions.

Sierra Energy is a waste conversion company focused on renewable fuel production and distributed generation of base load renewable energy. Sierra Energy's project deployment arm, SacPort BioFuels, was recently awarded a \$5 million investment from the California Energy Commission. These funds are supporting the development of a commercial waste to biofuels facility at the Port of West Sacramento demonstrating how locally generated waste can be sustainably converted into locally consumed ultra-low-carbon fuels.

We are very pleased to see that a percentage of EPIC funds are being set aside for the continued development and early-commercialization of bioenergy technologies. During the workshop there was discussion about biomass feedstock for gasification. Sierra Energy would like to suggest that municipal solid waste (MSW) also be included as an eligible feedstock for gasification. In some cases MSW has a higher energy content compared to biomass with the added benefit that gasification of MSW diverts waste from landfills and eliminates its resultant greenhouse gases (GHG) (a total of 1.5 tons of GHG for every ton of waste).

During the workshop there was discussion at length about community-scale facilities. Sierra Energy fully supports the direction of smaller facilities (we are currently designing a system that processes 25 tons of waste per day) and believes it not only reduces the transportation costs and logistics of hauling MSW and forest waste, but also gives small communities the potential for revenue that would otherwise be an expense. Turning a waste cost stream into a renewable energy revenue stream offers an ongoing economic opportunity for ratepayers throughout California.

During the workshop the utility companies mentioned concern for connecting these small-scale systems to the grid, especially in U.S. Forest Service wilderness areas. In view of this concern, we recommend EPIC funding allow waste & biomass gasification technologies that can produce renewable transportation fuels (such as diesel, gasoline, ethanol, hydrogen, etc.) as an option to be considered to be eligible along with electricity. This reduces the need to distribute power back into the grid, but still creates a renewable and high-value product, while reducing wildfire risk and costs to the utilities and converting a cost into a revenue stream, thus benefiting communities and ratepayers.

Thank you again for the informative workshop and for allowing participants and attendees to submit comments. We would be glad to provide any information,

examples, data, or clarifications if necessary.

Sincerely,

Mike Hart
President & CEO