



October 1, 2012

VIA ELECTRONIC MAIL

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

California Energy Commission <b>DOCKETED</b> <b>12-EPIC-1</b>
TN # 67406 OCT 01 2012

SUBJECT: DOCKET NO. 12-EPIC-01

Dear Commissioners and Staff:

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

As we noted in our previous comments to the Commission, the BAB2E Coalition is comprised of 18 public agencies whose wastewater treatment activities produce energy rich biosolids. According to the National Association of Clean Water Agencies, the energy potential in wastewater and biosolids exceeds the energy needed to treat wastewater by ten times. The BAB2E Coalition's goal is to harness this energy using innovative technologies. Once completed, our project will both generate renewable energy and address an impending biosolids management crisis in the Bay Area.

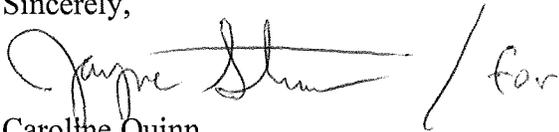
The BAB2E Coalition would like to express its appreciation to Commissioners and staff for incorporating our August 17 comments into Funding Initiative S12.1. As we noted then, a number of barriers to the commercialization of biosolids conversion technologies still exist despite the energy potential of biosolids. Given the high capital costs of deploying these technologies on a commercial scale, it is unlikely that ratepayers will benefit from these technologies without investment of EPIC funds.

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The BAB2E Coalition believes the EPIC Investment Plan approved by the Commission should include funding for commercial scale facilities. We believe that the “pre-commercial technology demonstration and early-stage deployment of biopower and biogas technologies and systems” referred to under Funding Initiative S12.1 should include funding for commercial scale facilities using technologies and processes successfully demonstrated at a pilot or pre-commercial scale. As such, we feel it would be appropriate to amend the EPIC Investment Plan to explicitly state that such funding is included as part of Funding Initiative S12.1.

We believe funding for full scale commercial biosolids to energy facilities will help fill funding gaps on the way to deploying this important technology. As such, the Bay Area Biosolids to Energy Coalition respectfully urges the inclusion of such funding as part of the first triennial investment plan for EPIC.

Sincerely,

A handwritten signature in black ink, appearing to read "Jayne Stum", followed by a forward slash and the word "for".

Caroline Quinn

Engineering Services Director, Delta Diablo Sanitation District  
Project Manager for the BAB2E Coalition

JS/CQ:bjm

cc: BAB2E Coalition Members  
District File P.10089  
Chron