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March 12, 2013

Adam Schultz  
Energy Division Staff  
California Public Utilities Commission  
San Francisco, CA

**Re: Comments on Draft Consultant Report on Small-Scale Bioenergy**

Dear Mr. Schultz:

The California Compost Coalition (CCC) appreciates the opportunity to review and comment on the draft consultant report on "Small-Scale Bioenergy" released April 9. As urban sector waste collectors and composters, we find that many of the waste descriptions and terms lack sufficient detail or explanation. CCC suggests a number of areas below where further clarification or correction of terms would be helpful.

CCC is a statewide organization representing operators of private, independent facilities who are involved in the processing and composting of green and food wastes that include the diversion of organic waste from landfills to bioenergy and composting while promoting sustainable agricultural policies. CCC represents 15 permitted green waste and food waste composting facilities, and several anaerobic digestion facilities. CCC members process over 1,000,000 tons per year green waste and food waste, with major expansions underway to include urban wood waste biomass gasification plants at our compost facilities to provide on-site renewable energy to electrify the site operations.

CalRecycle has adopted Strategic Directive No. 6 to divert 50% of organic material by 2020, and must prepare a Recycling Plan to reach a state wide goal to recycle 75% by 2020. Converting half of the 5.7 million tons of urban biomass (lumber) disposed of in landfills in 2008 could produce 2.85 million tons of wood chips, which could fuel 250 of these biomass gasification plants rated at 1 MW and generate 250 MW of distributed energy. Each plant would need to employ 2 workers per shift with 2.5 shifts per day, or 5 employees per facility and 2 wood grinder employees per day, and could create 1,750 direct jobs. The 2012 Bioenergy Action Plan projected that 4.82 million tons of biomass (from urban, agricultural, and forestry) could be utilized to install 500 MW of biopower, creating 2,500 direct jobs by 2020, where the urban sector would shoulder about half of the responsibility.

The 2012 Bioenergy Action Plan clearly intended to include urban biomass, we do not believe that SB 1122 intended to not include bioenergy from urban wood waste as the draft Report suggests.

CCC supports the detailed comments provided by the Bioenergy Association of California, as copied below. The draft report uses several different definitions and descriptions of waste categories, technologies and outputs that are at times inconsistent with each other and with the language of SB 1122. The differing and sometimes inaccurate definitions make it difficult to assess the report's accuracy about availability and allocation of different waste types. The report's definitions in the urban waste category are inconsistent with each other and with SB 1122 itself, which requires 110 megawatts from "biogas from wastewater treatment, municipal organic waste diversion, food processing, and co digestion." (SB 1122, Statutes of 2012, section 399.20(f)(2)(A)(i)).

In different sections of the report, this waste category is defined as "biogas from wastewater plants and green waste" (e.g., pages 1.1, 1.9, 1.10) or limited to wastewater treatment biogas and low solids green waste (e.g., pages 1.2, 3.1). In addition, the report misuses the term "green waste" which is limited to plant materials such as yard and agricultural waste and does not include food or food processing waste. The term "low solids green waste" is a misnomer altogether.

We urge the report authors to include a list of definitions that is consistent with CalRecycle's California waste regulations defining different waste types, as well as the categories set forth in SB 1122. Without consistent and accurate terminology, it is impossible to assess whether the report's findings on resource availability and costs are accurate. We also urge the report authors to use one term – bioenergy – to encompass the different technologies and outputs that are eligible for SB 1122, rather than limit specific sectors to "biomass" or "biogas" as the draft report does. SB 1122 defines eligible waste categories and project size, but it does not limit eligible technologies or outputs. In fact, both the agricultural and forestry categories refer specifically to "bioenergy" and not to "biomass" or "biogas." (SB 1122, section 399.20(f)(2)(A)(ii) and (iii)). The report should use the same terminology – bioenergy – as the statute to ensure that all eligible technologies and outputs are included.

Sincerely,



Neil S.R. Edgar  
Executive Director