

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue	)	Rulemaking 11-05-005
Implementation and Administration of	)	(Filed May 5, 2011)
California Renewables Portfolio Standard Program.	)	
_____	)	

**MOTION OF PLACER COUNTY AIR POLLUTION CONTROL DISTRICT FOR PARTY STATUS**

Pursuant to Rules 1.4 and 11.1 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, and the Commission’s May 5, 2011 Order Instituting Rulemaking in this proceeding, Placer County Air Pollution Control District (“APCD”) submits this motion requesting party status.

**I. DESCRIPTION OF PLACER COUNTY AIR POLLUTION CONTROL DISTRICT**

The Placer County Air Pollution Control District (“APCD”) is a special district created by state law to enforce local, state, and federal air pollution regulations. The District is a public agency with jurisdiction over stationary sources of air pollution within the County of Placer. The District has responsibility for enforcement of County air pollution rules as well as applicable provisions of State and Federal air pollution law. The APCD is governed by a Board of Directors. The mission of the APCD (as set by the Board of Directors) is to manage the Placer County’s air quality in a manner that protects and promotes public health by controlling and seeking reductions of air pollutants while recognizing and considering economic and environmental impacts.

**II. STATEMENT OF INTEREST**

Placer County includes a significant landbase stretching from the foothills of the Sierra Nevada to the shores of Lake Tahoe. Included in this landscape is over 550,000 acres of forested land, most of which is at significant risk of wildfire. These forests (like many in California) are stocked with unnaturally

dense vegetation that is highly susceptible to catastrophic wildfire. In the last 10 years alone, the County has experienced five major fires that burned more than 50,000 acres. These fires are expensive to fight, cause widespread environmental damage, and release tons of harmful emissions into the air.

The APCD, Placer County, and other public and private partners are implementing projects that reduce hazardous forest fuels, and transport and process excess forest biomass material such as limbs, tops and brush into clean energy. These projects have been demonstrated to significantly improve air and watershed quality, protect soil productivity, and lower fire suppression costs. Unfortunately, the costs to treat hazardous fuels are significant.<sup>1</sup> Public funding to support these treatments is dropping and will likely cause many projects to be significantly curtailed or outright eliminated.

An alternative market based opportunity to generate funding to support these beneficial projects is the utilization of woody biomass generated as a byproduct of sustainable forest management, hazardous forest fuels reduction, and ecological restoration activities. Strategic and sustainable expansion of the bio-power sector in California, by locating small-scale bio-power facilities adjacent to at risk forest regions, could provide a revenue source to support continued forest fuels reduction activities while delivering a suite of societal benefits and public good.

The District is in a unique position to comment on market price issues discussed within this proceeding as it is one of the public agencies specifically listed within the language of Section 399.20, and it has a unique perspective related to how small power generating facilities can mitigate emissions impacts. The methodology to determine market price will significantly affect the success or failure of these facilities and will in turn impact the air quality within Placer County and other air quality districts.

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<sup>1</sup>USDA Forest Service Pacific Southwest Research Station. 2009' *Biomass to Energy: Forest Management for Wildfire Reduction, Energy Production and Other Benefits*. California Energy Commission, PIER Program. CEC-500-2009-80.

### III. SERVICE

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to the following:

Christiana Darlington  
General Counsel  
Placer County Air Pollution Control District  
175 Fulweiler Avenue  
Auburn, Ca 95603  
Telephone: 530/889-4044  
Facsimile: 530/889-4069  
Email: [cdarling@placer.ca.gov](mailto:cdarling@placer.ca.gov)

### IV. CONCLUSION

PLACER COUNTY AIR POLLUTION CONTROL DISTRICT has a unique interest in this proceeding that cannot be represented by any other party. For the reasons stated above, PLACER COUNTY AIR POLLUTION CONTROL DISTRICT respectfully requests the Commission grant this Motion for Party Status.

DATED: July 20, 2011

Respectfully submitted,

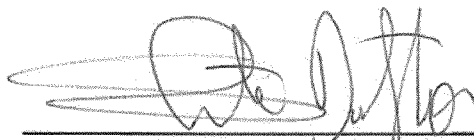
/s/ Christiana Darlington  
CHRISTIANA DARLINGTON  
General Counsel

**VERIFICATION**

I am an officer of the non-profit organization herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 20<sup>th</sup> day of July, 2011, at Auburn, California.

A handwritten signature in black ink, appearing to read 'Christiana Darlington', written over a horizontal line.

CHRISTIANA DARLINGTON  
General Counsel