

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

Order Instituting Rulemaking to Continue  
Implementation and Administration of California  
Renewables Portfolio Standard Program

R. 11-05-005  
(Filed May 5, 2011)

**California Association of Sanitation Agencies (CASA)  
MOTION FOR PARTY STATUS**

CALIFORNIA ASSOCIATION OF SANITATION  
AGENCIES  
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Date: April 22, 2013

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In accordance with Rules 1.4 and 11.1 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, CASA respectfully submits this motion for party status in the above-captioned proceeding.

**I. REQUEST FOR PARTY STATUS**

The Commission issued its Order Instituting Rulemaking in R.11-05-005 on May 5, 2011, as the vehicle for the Commission's continuing administration and oversight of the renewables portfolio standard (RPS) program. Through the proceeding, the Commission will implement major changes in the RPS program resulting from the enactment of Senate Bill (SB) 2 (IX) (Simitian), Stats. 2011, ch. 1. The proceeding also addresses other new legislative mandates, such as the statutory enactments listed below that prompted a Second Amended Scoping Memo issued January 9, 2013. These four new statutes include:

1. SB 1122 (Rubio), Stats. 2012, ch. 612;
2. SB 2196 (Chesbro), Stats. 2012, ch. 605;
3. Assembly Bill (AB) 1900 (Gatto), Stats. 2012, ch. 602; and
4. AB 2187 (Bradford), Stats. 2012, ch. 604.

Three of the four new laws directly impact bioenergy and its role in the RPS program. SB 1122 requires investor-owned utilities (IOUs) to procure at least 250 megawatts of generation from new bioenergy projects; SB 2196 makes various changes to the treatment of biomethane fuel in RPS procurement; and

AB 1900 instructs the Commission to “adopt policies and programs that promote the in-state production and distribution of biomethane [as defined].”

CASA requests party status because many of our members produce biogas and biomethane through anaerobic digestion as a component of the wastewater treatment process and generate significant renewable energy from that biogas and biomethane. CASA and its members also promote and facilitate the advancement of technologies that will result in a cleaner environment and reduced greenhouse gas emissions.

## **II. BACKGROUND**

CASA members, including cities, counties, and special districts, treat more than 90% of the municipal wastewater generated in California at Publicly Owned Treatment Works (POTWs), simultaneously creating and recycling beneficial products such as biosolids, biogas, and recycled water. CASA’s members include actual and potential biomethane producers interested in open access and increased avenues for utilization of biomethane. As relevant to this proceeding, CASA members produce significant renewable energy through anaerobic digestion systems and increasingly are boosting biogas production by accepting hauled in organic waste for the purpose of anaerobic digestion. CASA seeks to become a party to this proceeding in order to ensure that the interests of wastewater treatment plants across the state, many of which produce biomethane that will be impacted by the proposed rules, are adequately represented and to ensure that biomethane produced as part of anaerobic digestion processes is treated as the valuable and viable renewable energy commodity in the future.

## **III. BASIS FOR REQUESTING PARTY STATUS**

In accordance with Rule 1.4(b)(2), CASA requests party status in Rulemaking 11-05-005 because CASA members have interests that are reasonably pertinent to the issues presented in this proceeding. Specifically, CASA requests to become a party to the rulemaking proceeding so that it may file formal comments in response to issues arising from the Second Amended Scoping Memo. CASA members generate between 40% and 70% of their on-site power needs through utilization of the biomethane produced through anaerobic digestion and are actively seeking to increase their biogas production. CASA members produce sustainable renewable energy while providing essential public services and seek to be part of the solution for both the state’s renewable energy mandate of 33% by 2020 and its recycling goal of 75% of solid waste by 2020. CASA members can help meet this targets through the generation of biogas and the receipt of hauled in organic waste which may otherwise be buried at a landfill. As such, it is vital that we be a proactive party to the proceeding so the wastewater sector’s offerings are understood

and taken into account in the decision making process. The decisions made in R-11-05-005 will directly impact the wastewater community in California.

#### IV. NOTICE AND COMMUNICATIONS

Please add the following persons to the service list for this proceeding for purposes of notice, orders, and communications:

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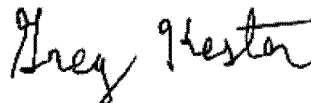
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#### V. CONCLUSION

For the reasons stated above, CASA requests that the Commission grant this motion for party status and designate CASA as a party in this proceeding.

Respectfully submitted this 22<sup>nd</sup> day of April, 2013 at Sacramento, California.

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