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Bcc:

Subject: R.11-05-005: Draft study "Small-scale bioenergy: resource potential, costs, and FIT implementation assessment"

To all parties on the service list for R.11-05-005:

Attached is a DRAFT study titled "Small-Scale Bioenergy: Resource Potential, Costs, and Feed-in Tariff Implementation Assessment" that was prepared for the California Public Utilities Commission's Energy Division by consulting firm Black & Veatch. Energy Division staff commissioned this study to provide analysis in support of the implementation of SB 1122 (Rubio), a 250 MW set-aside for small-scale bioenergy projects within the Section 399.20 Feed-in Tariff program.

In conjunction with the draft study, Energy Division staff is also attaching an Excel file that contains a draft version of the levelized cost of electricity (LCOE) calculator developed by consulting firm Black & Veatch to generate the cost assumptions used in this study. This model

has been created to provide stakeholders with detailed information regarding cost inputs and assumptions. The user-friendly model allows stakeholders to test these inputs and assumptions.

Energy Division staff is soliciting informal, written comments in response to the attached draft study and the accompanying Excel model. These comments will be used by Energy Division staff to inform an agenda for a public workshop at the CPUC (for which a notice will be issued shortly) designed to refine and improve the analysis contained in this draft version of the study.

Comments must be submitted by 5:00pm on Wednesday, April 24, 2013, should be limited to no more than 10 pages, and should focus on (but need not be limited to) the following issues:

- (1) Whether the resource potential estimates included in this draft study are accurate? (*see, Section 3.0 Resource Quantification, and Appendices A and B*)

- (2) Whether there is a preference, and the rationale for such a preference, for one of the resource allocation options described for allocating SB 1122 technology targets by utility? (*see, Section 5.4*)

- (3) Whether the levelized cost of electricity (LCOE) estimates included in this draft study, as developed by the attached Excel model, are reasonable? If you believe that the cost estimates are not reasonable, please provide publicly available source data to support your assertions. (*see, Section 4.0 Levelized Cost of Generation Estimates*)

- (4) Whether the general characterization of the current state of the small-scale bioenergy market in this study is accurate? (*various locations throughout the study*)

Instructions for submitting comments: The submission of any comments will be informal and will not be on the record in the proceeding for R.11-05-005. As a result, parties should not formally file their comments with the CPUC. Comments should only be served electronically on the service list for R.11-05-005, and copied directly to Adam Schultz, Energy Division Staff, at adam.schultz@cpuc.ca.gov. There will be no opportunity for informal reply

comments.