BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration, and Consider Further Development, of California Renewables Portfolio Standard Program.	Rulemaking 18-07-003

INFORMAL REPLY COMMENTS OF CENTER FOR BIOLOGICAL DIVERSITY, SIERRA CLUB, AND THE PARTNERSHIP FOR POLICY INTEGRITY ON THE BIOMAT PROGRAM REVIEW AND STAFF PROPOSAL

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The Center for Biological Diversity, the Sierra Club, and the Partnership for Policy Integrity (collectively, "Environmental Groups"), thank the California Public Utilities Commission ("Commission") for the opportunity to comment. We respectfully submit these reply comments in response to the December 7, 2018 stakeholder comments on the Bioenergy Market Adjusting Tariff ("BioMAT") Program Review and Staff Proposal and file them pursuant to the email from James McGarry, Energy Division staff member, extending the reply comment deadline to January 4, 2019.

DISCUSSION

In Reply Comments, many parties agree with the two main concerns raised by the Environmental Groups in our December 7, 2018 Comments. First, the Public Advocates Office ("Public Advocates") and the Joint Investor-Owned Utilities ("Joint IOUs") caution the Commission to be wary of requiring ratepayers to subsidize these projects until the purported societal benefits of BioMAT generation have been demonstrated. BioMAT facilities have failed to proliferate because bioenergy is economically unjustifiable; market interventions that render BioMAT pricing less competitive at the expense of ratepayers are not an appropriate response.

Next, Public Advocates and the Joint IOUs urge the Commission to tailor the BioMAT program to statutory and statewide goals by maintaining the small, community scale of facilities, using primarily fuels that have been identified as wildfire risks, and requiring that BioMAT facilities show net greenhouse gas emissions reductions. The Environmental Groups agree with the Commission that the BioMAT program was intended to reduce greenhouse gas ("GHG") emissions; the *only way* to ensure the program can meet this legislative goal is if facilities are required to demonstrate net GHG emissions reductions as a precondition for BioMAT eligibility.

As discussed in more detail below, stakeholder engagement and a number of preexisting and promising potential tools can help the Commission with the task of developing a customized calculator.

I. The Commission should not adopt any proposal unless it benefits ratepayers and the environment.

A. The purpose of BioMAT is to benefit ratepayers and the environment.

The Bioenergy Association of California ("BAC") cites Senate Bill 1122 author Senator Rubio's statement that the bill's purpose was to "unleash a growth spurt in California's biopower market" as evidence that the Commission should support bioenergy development at any cost.[1] But in the same analysis, Senator Rubio stated, "Unless and until the [Commission] accounts for benefits to ratepayers and the environment from reducing air pollution and global warming emissions by generating electricity from small renewable biomass and biogas, a separate procurement requirement for these technologies is necessary."[2]

The purpose of the BioMAT program, then, is not to spur unbridled growth at all costs but to support small-scale projects that benefit ratepayers and the environment. The Commission should not grow the biopower market at the expense of ratepayers; rather, the Commission should quantify and consider the benefits of BioMAT projects and weigh them against their high costs to ratepayers and potential for ecosystem degradation and GHG emissions.[3]

B. The market depth requirement protects ratepayers.

Like Maas Energy Works ("Maas") and the Agricultural Energy Consumers Association ("AECA"), the Environmental Groups oppose reducing the market depth requirement from five to three unaffiliated applicants. As Maas correctly notes, the market is undersaturated, so this change would most likely lead to price uncertainty.[4] Likewise, AECA asserts, "Reducing the market depth requirement will simply increase price volatility."[5] If the ratepayer is a priority, price volatility and market uncertainty should be viewed as undesirable.

However, the BAC considers price volatility a necessity to the success of the BioMAT program. The BAC states, "Allowing for the price to fluctuate more easily will help encourage

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[1] BAC Comments at p. 2.
[2] Bill Analysis, Assembly Committee on Utilities and Commerce at p. 2 (June 22, 2012), https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201120120SB1122.
[3] Environmental Groups Comments at pp. 3-7.
[4] Maas Energy Works Comments at p. 2.
[5] AECA Comments at p. 2.

participation and protect ratepayers from overpaying."[6] The Commission should not endorse market volatility to incentivize bioenergy. The BAC's argument prioritizes bioenergy development and ignores the interest of ratepayers who would undoubtedly benefit from transparent and predictable pricing. The California Biomass Energy Alliance ("CBEA") and the Sierra Nevada Conservancy ("SNC") also support market depth reduction. SNC supports the change because, "it is unlikely that there will be 5 unaffiliated applicants within the forest bioenergy category."[7] This assertion is evidence that the BioMAT program is unlikely to succeed without drastic, costly measures. It is not in the interest of ratepayers for a small number of developers to control the small-scale bioenergy industry in California and if this is truly the only way that the BioMAT program can succeed, the Commission should not continue to support it.

C. Changing the definition of "affiliated applicants" will prevent collusion.

The Environmental Groups share Public Advocates' and the Joint IOU's concern that the current definition of "unaffiliated" leaves open the possibility that applicants will collude to artificially drive up prices. Clearly, the unaffiliated applicant rule is not working as intended because under the current definition, several BioMAT projects that share common developers and/or family members are not counted as "affiliated."[8]

BAC argues, "Until collusion has been found, there is no need to change the program for a low likelihood risk with low potential cost impacts."[9] The Commission need not wait until there is evidence of collusion to take steps towards preventing it. We urge the Commission to use this opportunity to prevent future gaming of BioMAT prices.

D. The current end date should not be extended.

Despite the BioMAT program's lack of success in developing a small-scale energy market and its inability to show societal or environmental benefits, SNC, BAC, Placer County Air Pollution Control District ("PAPCD"), Green Power Institute ("GPI"), Maas, the US Forest Service ("USFS"), and Dairy Cares all advocate for an extension of the BioMAT program for at least five years after the original end date in 2021. The USFS argues that the program deadline for Category 3 facilities should be extended until 50 MW has been procured because "[t]he time it takes to develop and implement a Category 3 BioMAT project is not known yet."[10] Ratepayers should not have to wait indefinitely for a program that has shown no benefits and will not be implemented on a reasonable timeline.

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[6] BAC Comments at p. 8.
[7] SNC Comments at p. 3.
[8] *See* Joint IOUs Comments at p. 5.
[9] BAC Comments at p. 10.
[10] USFS Reply Comments at p. 2.

The Environmental Groups agree with Public Advocates, who recommend that "the BioMAT program's end date should not be extended unless the Commission determines that BioMAT substantially contributes to the achievement of other statewide climate, waste diversion, and public safety goals."[11] BioMAT projects sell energy at high costs to ratepayers and are unnecessary to fulfill IOU renewable procurement minimums. The BioMAT program is far from the state's only method of advancing its climate, waste, and public safety goals and therefore it need not be extended.

The Commission must view each BioMAT revision through the lens of the program's intent: to "account[] for benefits to ratepayers and the environment from reducing air pollution and global warming emissions by generating electricity from small renewable biomass and biogas."[12] The Commission should evaluate whether the BioMAT program provides its purported benefits and then decide whether changes that increase costs to ratepayers are justified.

II. <u>The Commission must implement BioMAT in a manner consistent with statutory and statewide goals.</u>

A. The Commission must maintain the three MW cap.

SB 1122 explicitly limits BioMAT eligibility to facilities that deliver no more than three MW to the grid at any time.[13] Consequently, we agree with Public Advocates and the Joint IOUs that increasing the three MW cap for BioMAT eligibility would require a legislative change.

As the Sierra Nevada Conservancy ("SNC") points out, "SB 1122 was designed to assist community scale projects distributed across the forested region. This project scale is appropriate for the feedstock resource, which is expensive to transport long distances."[14] An increase in the generation limit for BioMAT projects would allow sellers to build larger-scale, more centralized facilities, but this is not the stated goal of the BioMAT program. Rather, the Legislature clearly directed the Commission to foster small-scale development at the community level. Thus, the three MW cap should be maintained.

And while some groups, such as GPI and Maas, claim that the economies of scale enabled by larger facilities are necessary for the BioMAT program's success, we agree with BAC that the three MW cap is not the "reason for the program's slow progress"[15] Rather, market transformation has failed to occur because the high costs of BioMAT energy are unjustifiable.

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[11] Public Advocates Comments at p. 10.
[12] Bill Analysis, Assembly Committee on Utilities and Commerce at p. 2 (June 22, 2012), https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=201120120SB1122.
[13] Cal. Pub. Util. Code § 399.20(f)(2)(E)(i).
[14] SNC Comments at p. 2.
[15] BAC Comments at p. 13.

B. The 80% HHZ fuel requirement is a reasonable way to meet statewide wildfire mitigation goals.

The Environmental Groups agree with Public Advocates and the Joint IOUs that an 80% HHZ fuel requirement for Category 3 facilities would "better align" the BioMAT program to the goals of the Governor's Emergency Proclamation on Tree Mortality—namely, to mitigate wildfire risk to communities.[16] Because the Governor's goal is to mitigate wildfire risk, the HHZ requirement should be limited to Tier 1 areas, which are located near communities, roads, and utility lines and pose the greatest threat to public safety.

The Environmental Groups also support Public Advocates' recommendation that the Commission remove the price cap incentive if the 80% HHZ fuel requirement is adopted. Allowing BioMAT facilities that use 60% HHZ fuel to accept contracts priced above the soft cap of $199.72/MWh when they are required to use 80% HHZ fuel would unfairly burden ratepayers with an unnecessary subsidy. A price adder in lieu of an 80% HHZ requirement, as BAC suggests, is also inappropriate because it unfairly burdens ratepayers.

SNC, PACPD, CBEA, and the BAC oppose this proposal in part because it imposes some reasoned constraint on forest thinning. PAPCD remarks, "Wildfires happen in every corner of California."[17] The implication is that forest thinning should occur everywhere in California. Citing no evidence, SNC claims that "reduction of excess forest fuel in general is conducive to the promotion of healthy forests" and "[f]orest thinning projects are needed throughout the forested areas."[18] By PAPCD and SNC's logic, forest thinning *anywhere* delivers the specific benefits contemplated under the Emergency Proclamation and the BioMAT program—that is, less severe wildfires and fewer net GHG emissions. But this is simply not the case.

Scientific studies indicate that forest thinning and burning the residues for bioenergy results in reduced sequestration and a transfer of carbon to the atmosphere that can last decades or even a century. A recent report commissioned by the California Energy Commission found that, in low-to mid-elevation mixed conifer forests in California and Oregon, fuel treatment did not decrease fire intensity.[19] Further, "[i]f a fire were to occur in the year of treatment, all projects would still experience net emissions, though the impact of treatment emissions would be

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[16] Joint IOUs Comments at p. 9.
[17] PACPD Comments at p. 3.
[18] SNC Comments at p. 7.
[19] *See* Tim Pearson *et al.*, *Emissions and Potential Emission Reductions from Hazardous Fuel Treatments in the WESTCARB Region*, California Energy Commission, PIER Program, CEC-500-2014-046 (May 2014) ("2014 PIER Study"), https://www.energy.ca.gov/2014publications/CEC-500-2014-046/CEC-500-2014-046.pdf.

approximately halved in all cases."[20] Similarly, another recent study that found that increased logging of forests actually increases, rather than decreases, fire intensity.[21] Clearly, indiscriminate forest thinning throughout the state will neither mitigate wildfire risk to communities nor decrease GHG emissions. The BioMAT program has specifically articulated goals; its implementation should be tailored to meet them.

SNC and BAC also raise concerns that the 80% HHZ requirement would render the BioMAT program infeasible. However, as Public Advocates correctly notes, Category 3 BioMAT facilities are well-suited to utilize HHZ fuel.[22] All Category 3 facilities that have executed BioMAT contracts are located within or near HHZ zones.[23]

C. Without a net GHG emissions reductions requirement California cannot meet its statewide climate goals.

The Environmental Groups **strongly support** Staff's proposal to require net GHG emissions reductions as a precondition for BioMAT eligibility. We agree with Public Advocates that such a requirement is consistent with the legislature's directive that the Commission incorporate SB 100's GHG goals into long-term planning, and necessary to ensure that California reaches SB 100's goal of 100% renewable and zero-carbon energy resources by 2045.[24] We also share the Joint IOU's concern that only generation that demonstrates lifecycle GHG emissions reductions justifies the high costs of BioMAT procurement.[25]

A number of groups oppose this vital proposal on entirely baseless grounds. Maas, for example, believes a net GHG emissions reductions requirement is unnecessary because "the environmental benefits for projects are implicit."[26] Implied benefits do not make sound policy. Ratepayers should only be required to pay for demonstrated benefits. GPI argues that "there is abundant evidence that on a generic basis projects of the kind that are eligible for the BioMAT program clearly reduce net emissions of biogenic greenhouse gases."[27] GPI incorrectly attributes this assertion to EPA's Framework for Assessing Biogenic Emissions from Stationary Sources, when the Framework explicitly recognizes that "[c]arbon neutrality cannot be assumed for all

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[20] Katie Goslee *et al*., *Final Report on WESTCARB Fuels Management Pilot Activities in Shasta County, California*, California Energy Commission, Public Interest Energy Research ("PIER") Program, CEC-500-XXXX-XXX (July 2010) ("2010 PIER Study") at p. 10, attached as Supplemental Material to 2014 PIER Study.
[21] Curtis M. Bradley *et al.*, *Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western USA?* Vol 7 Ecosphere (Oct. 2016).
[22] Public Advocates Comments at p.13.
[23] *Id.*
[24] *Id.* at p. 16.
[25] Joint IOUs Comments at p. 11.
[26] Maas Energy Works Comments at p. 9.
[27] GPI Comments at p. 5.

biomass energy a priori."[28] Rather, biogenic carbon emissions vary considerably as a result of feedstock types and sources, production methods, and leakage effects. Reliance on "generic" findings is inconsistent with the Commission's duty under SB 100 to incorporate climate goals into all long-term planning.

In fact, the evidence shows that biomass generation facilities are net GHG emitters. An industry-level analysis relying on data from the Energy Information Administration for 2001-2016 and CO_2 combustion emissions factors used by the EPA for power sector modeling (converted to metric tonnes), shows that smaller non-industrial biomass facilities that use primarily woody feedstock—such as those eligible for BioMAT—are net GHG emitters.[29] Even assuming that all feedstock was from forestry residues that would otherwise decompose, cumulative direct emissions from the smaller non-industrial biomass sector at year 10 were 208 Mt, and cumulative net emissions at year 10 were 120 Mt.[30] Thus, even after a decade within which trees could repopulate, the net emissions impact was 58% of total emissions.[31] That is, the majority of the direct emissions from biomass generation were additional, contributing to radiative forcing over a fifty-year period that would not have otherwise occurred. GPI claims that a model that considers only CO_2 is incomplete because CH_4 emissions can "double or triple" the radiative forcing effect of emissions from wildfires as compared to emissions from biomass generation facilities.[32] However, this claim is baseless, which is perhaps why GPI has offered no supporting citations.

Citing no evidence whatsoever, the SNC claims that the GHG emissions reductions requirement is unnecessary because "bioenergy facilities utilizing waste biomass from the forest do generally reduce emissions relative to pile burning and wildfire."[33] GPI claims that biomass generation "clearly reduce[s]" net GHG emissions because of consequent reductions in "landfilling and open burning of biomass residues."[34] Similarly, the BAC claims that biomass generation reduces GHG emissions because biomass generation releases fewer GHGs than do

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[28] U.S. EPA Science Advisory Board, *Framework for Biogenic CO_2 Emissions from Stationary Sources* at p. ii (Nov. 2014).
[29] Mary S. Booth, *Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy*, Vol. 13 Env't. Research Letters at p. 5 (Feb. 21, 2018), https://doi.org/10.1088/1748-9326/aaac88.
[30] *Id.*
[31] *Id.*
[32] GPI Comments at p. 6.
[33] SNC Comments at p. 8.
[34] GPI Comments at p. 5. GPI incorrectly relies on EPA's Framework for Assessing Biogenic Emissions from Stationary Sources to support the assertion that biomass generation always reduces net emissions, when the Framework explicitly recognizes that "[c]arbon neutrality cannot be assumed for all biomass energy a priori." U.S. EPA Science Advisory Board, *Framework for Biogenic CO2 Emissions from Stationary Sources* at p. ii (Nov. 2014). Consequently, EPA's Scientific Advisory Board recommends a nuanced approach to calculating GHG emissions.

open burns or wildfire.[35] This generalization is not logically sound, nor is it based on science. Not all trees used for biomass generation would alternatively be burned in piles or in wildfires or deposited in landfills.[36] More frequently, once already harvested, these trees would slowly decompose—and, as elaborated upon in our December 7th comments, emissions from decomposition may take years, decades, or even centuries to reach atmospheric parity with emissions from bioenergy generation. Alternatively, the feedstock might also have been used to create wood products or mulch. As the Environmental Groups explained in our comments, an accurate accounting methodology must accurately consider the feedstock's alternative fates.

Some groups, such as the PAPCD and CBEA, argue that emissions associated with BioMAT projects are justified because "[r]estoring the forests to a more fire-resilient condition will make a substantial contribution to California's efforts to fight climate change."[37] As mentioned above, forest management programs like those incentivized by BioMAT have been shown to lead to net GHG emissions while failing to decrease fire severity. A report commissioned by the California Energy Commission found that, when measured against emissions from wildfires, fuel reduction activities result in greater net GHG emissions.[38] The authors quantified "baseline emissions from wildland fires and [GHG] emission reductions attributable to fuel reduction" to determine whether carbon offsets could be granted for forest management projects.[39] They found that, because of the very low probability of a fire (less than .76 perfect per year), the high GHG emissions from fuel treatment, reduced sequestration from fuel treatment, and the failure of fuel treatment to meaningfully reduce GHG emissions from fires (on average, emissions were only reduced by 6 percent), fuel "treatments clearly led to significant increased net [GHG] emissions" and are not suitable for carbon offsets.[40] Further, fuel treatment did not decrease fire intensity and, "[i]f a fire were to occur in the year of treatment, all projects would still experience net emissions, though the impact of treatment emissions would be approximately halved in all cases."[41] Contrary to CBEA, SNC, GPI, and BAC's unfounded assertions, the burning of forest residues for bioenergy clearly leads to net GHG emissions.

Next, GPI incorrectly argues that development of a bioenergy net emissions impacts calculator is infeasible.[42] In fact, many such calculators already exist and could be readily adapted for this purpose. For example, the California Energy Commission-sponsored report

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[35] BAC Comments at p. 17 (citation omitted).
[36] *See e.g., id.* at p. 17.
[37] CBEA Comments at p. 5; *see also* PAPCD Comments at p. 6 (alleging that all fuel reduction activities have clear benefits).
[38] 2014 PIER Study.
[39] *Id.* at p. iv.
[40] *Id.* at p. 34.
[41] 2010 PIER Study at p. 10.
[42] GPI Comments at p. 7.

discussed above developed "a rigorous methodology to quantify baseline emissions from wildland fires and emission reductions attributable to fuel reduction."[43] Similarly, Mary S. Booth's "Not carbon neutral: assessing the net emissions impact of residues burned for bioenergy" clearly outlines a model that calculates sector-wide net emissions from biomass generation:

> Built in Excel, the model calculates cumulative net emissions as cumulative direct emissions (CO_2 from combustion for energy plus CO_2 from harvesting, producing, and transporting biomass, or 'HPT emissions'), minus cumulative counterfactual emissions (what emissions would be if the biomass were left in the field to decompose or were burned without energy recovery). The net emissions impact (NEI) is the ratio of cumulative net emissions to cumulative direct emissions.[44]

CO_2 from combustion is measured at the stack. Based on a review of the scientific literature, HPT emissions for forest residues is equivalent to 4% of the carbon content of green chips.[45] Counterfactual emissions are calculated as:

Then, this figure is converted to CO_2.[46] This calculator is valid for use when fuel is sourced from residues but would require some adjustments for when fuel is sourced from whole trees removed in thinning operations or specifically for use as bioenergy. The calculator should also rely on feedstock-specific calculations particular to the fuel-shed where a facility obtains the feedstock. As the Schatz Energy Research Center at Humboldt University ("SERC") correctly states, no

[43] 2014 PIER Report at p. iv.
[44] Mary S. Booth, *Not carbon neutral: Assessing the net emissions impact of residues burned for bioenergy*, Vol. 13 Env't. Research Letters at p. 2 (Feb. 21, 2018), https://doi.org/10.1088/1748-9326/aaac88.
[45] *Id.* at p. 3.
[46] *Id.* at p. 2.

evidence has been presented showing that burning forest residues for bioenergy impacts wildfire risk and/or severity at a landscape scale.[47] Therefore, impacts to wildfire risks need not be included in the calculator.

It appears that the SERC is developing a tool that might be directly on point, provided it can assess net emissions when whole trees as well as residues are used as fuel: the California Biomass Residue Emissions Characterization (C-BREC) model.[48] Of course, it is impossible to endorse this tool without having seen it. We request that the Commission hold an open workshop in which SERC briefs staff and stakeholders on the C-BREC model and stakeholders can offer comments and insights. With stakeholder input, the Commission will be able to develop a customized calculator in a timely and efficient manner.

Next, SNC, GPI, CBEA, Maas Energy, Dairy Cares, USFS, and ACEA incorrectly claim a net GHG emissions reductions requirement would burden BioMAT facilities with prohibitively expensive and complicated compliance obligations. However, this is simply not the case. As described above, there are available models the Commission could easily adapt to this task. The model would most likely take the form of an Excel spreadsheet, as do the Air Resources Board tools Staff cite on pages 12 and 13 of the Staff Proposal. These models are extremely straightforward to use. The Dairy Digester model, for example, asks users to input quantitative figures where applicable and includes dropdown menus with various potential responses for qualitative questions (one example: "Is the effluent stored in a covered lagoon?" Potential answers: yes or no). The quantitative information required is relatively basic and reflects fundamental characteristics of the user's business, such as pounds of milk produced per cow per day and milk fat percentage. BioMAT facility operators already know the kinds of information a calculator would require, such as pounds of feedstock burned per day, what type of feedstock is burned, and where the feedstock was harvested. Load-serving entities are required to quantify GHG emissions from the stack in their Integrated Resource Plans. Entering this data into a model represents a few extra minutes of work per compliance period.

Finally, the Joint IOUs recommend that "directed biogas" be ineligible under the BioMAT facility because directed biogas is commingled with natural gas and therefore cannot be considered a renewable fuel.[49] The Environmental Groups support this recommendation.

D. Biomass generation facilities should be located near fuel sources.

The Environmental Groups recommend that the Commission include a geographic component to the requirement that facilities be "strategically located." Category 3 BioMAT

[47] SERC Comments at p. 3.
[48] SERC Comments at p. 4.
[49] Joint IOUs Comments at pp. 12-13.

projects in particular should be located in close proximity to the truly hazardous trees that comprise the feedstock in order to minimize transportation emissions. Additionally, BioMAT projects emit localized pollution and therefore should not be located near populated areas or within degraded airsheds. As SERC correctly notes, "A geographical requirement keeping BioMAT facilities out of populous areas, DACs, or degraded airsheds would support the case that these facilities provide a net benefit to CA public health."[50]

Maas opposes strategic location, which they characterize as an "additional barrier."[51] Requirements that protect the environment, public health, or ratepayers should not be considered barriers to participation but rather essential protections. The BAC argues, "The entire state of California is susceptible to wildfire, drought, and invasive pests like the bark beetle that result in the need for forest and other vegetation removal."[52] But siting bioenergy facilities that burn trees as fuel and assuming that trees in their vicinity will need to be removed is a backwards strategy. The Commission should first identify areas where planned hazardous tree removal and defensible space thinning projects could sustainably support a bioenergy project, and then site BioMAT projects to minimize the probability of needing feedstock sources outside of true hazard trees and defensible space projects, in order to minimize ecosystem degradation. Siting BioMAT facilities without strategic analysis will encourage unnecessary tree removal and result in greater GHG emissions, but without any of the purported benefits of BioMAT generation.

III. <u>The Commission should design a collaborative, coordinated process that fosters stakeholder engagement.</u>

The Environmental Groups support the Joint IOUs' request for workshops, joint calls, and stakeholder engagement for emissions quantification methodology development.[53] Ensuring that BioMAT projects advance the state's goal to reduce GHG emission is essential to the wellbeing of the state and all its residents. All parties should be committed to creating and implementing an accurate emissions quantification methodology.

The process of revising the BioMAT program should be transparent and inclusive. Workshops, conference calls, and stakeholder engagement of any kind will lead to a BioMAT program that is consistent with statewide goals. As the Joint IOUs state, an open process would "increase consistency across related programs, and reduce costs for market participants and customers."[54]

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[50] SERC Comments at p. 2.
[51] Maas Comments at p. 8.
[52] BAC Comments at p. 15.
[53] Joint IOUs Comments at p. 11.
[54] *Id.*

CONCLUSION

The Environmental Groups urge the Commission to revise the BioMAT program so that it furthers—rather than impedes—statewide goals of GHG emissions reductions, wildfire risk mitigation, and ratepayer protections. Maintaining the community scale of BioMAT facilities and requiring that facilities derive feedstock from high risk zones is consistent with these goals. Most importantly, we urge the Commission to require that BioMAT facilities demonstrate that they deliver net GHG emissions reductions—a purported benefit for which ratepayers, as well as forest species and ecosystems, pay dearly.

Respectfully,

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