

Thank you for the opportunity to provide comments on the EPIC draft as well as **and for** incorporating our CEO, Mike Hart, **including Sierra Energy** in the **recently held workshop** permitting panel during the workshop. Sierra Energy's experiences during the permitting and planning processes, **including** of our **recent** SacPort BioFuels project, **have**s been exceptional **positive** and we were **glad to have the opportunity to share our experience and be** pleased to be a part of such an informative and beneficial **the EPIC discussions** program.

Sierra Energy is a waste **conversion** gasification and renewable energy company **focused on renewable fuel production and distributed generation of base load renewable energy**. This summer Sierra Energy's project **deployment** development arm, SacPort BioFuels, was **recently** awarded a \$5 million grant **investment** from AB118 funds by the CEC **the California Energy Commission**. These funds **are** will assist in the **supporting the** development of a commercial waste to biofuels facility at the Port of West Sacramento demonstrating how locally generated waste can be turned **sustainably converted** into locally consumed **ultra-low-carbon** fuels, profitably.

We are very pleased to see that a percentage of EPIC funds are being set aside for the continued development and early-commercialization of bioenergy technologies. During the workshop there was discussion about **biomass feedstock for** gasification feedstocks especially biomass. *Sierra Energy would like to suggest that municipal solid waste (MSW) also be specified included as an eligible feedstock for gasification.* In some cases MSW has a higher energy content compared to biomass with the added benefit that **gasification of MSW diverts waste from landfills and eliminates its resultant greenhouse gases (GHG) (a total of 1.5 tons of GHG for every ton of waste)**. Not only does MSW have comparable **a higher** energy content **compared** to biomass, but the gasification of MSW diverts waste from landfills and eliminates its resultant greenhouse gases (**GHG**ghg) (1.5 million tons of **GHG**ghg for every ton of waste), **plus the additional transport and logistical benefits of MSW, and the associated substantial additional GHG emission reductions offered by beneficial conversion of MSW..**

DAlso, during the workshop there was discussion at length about community-scale facilities. Sierra Energy fully supports the direction of smaller facilities (we are currently designing a system at **that processes** 25 tons **of MSW**waste per day) and believes it not only reduces the transportation costs and logistics of hauling MSW and forest waste, but also gives small communities the potential for revenue that would otherwise be an expense. **Turning a a MWSSW**waste **cost stream into a renewable energy revenue stream offers an ongoing economic opportunity for ratepayers throughout Califonria**California..

During the workshop the utility companies mentioned concern for connecting these small-scale systems to the grid, especially out in forest service **U.S. Forest Service** wilderness areas. In view of this concern, Sierra Energy **we offer the**

consideration of recommend EPIC funding allowing suggests the eligibility of waste & biomass gasification technologies that can produce renewable transportation fuels (such as: diesel, gasoline, ethanol, hydrogen, etc.) as an option to **be considered to be eligible along with** electricity. This reduces the need to distribute power back into the grid, but still creates a renewable and high-value product, while reducing wildfire risk and costs to the utilities **and converting a cost into a revenue stream**, thus benefiting **communities and** ratepayers.

Thank you again for the well-organized and informative workshop **and for**, as well as allowing participants and attendees to submit comments. We would be **glad** pleased to provide any information **, examples, data, or clarifications if necessary** the CEC would deem helpful whenever necessary.

Sincerely,
Sierra Energy

Mike Hart,
President & CEO