

## Stakeholder Comments of Stone Hill CP

Submitted by	Company	Date Submitted
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Please use this template to provide written comments on the Clean Energy and Pollution Reduction Act Senate Bill 350 (SB350) Study initiative posted on April 25, 2016.

Please submit comments to [regionalintegration@caiso.com](mailto:regionalintegration@caiso.com) by close of business  
June 22, 2016

### 1. Are any of the study results presented at the stakeholder workshop unclear, or in need of additional explanation in the study's final report?

Comment: Yes. All four require additional explanation of the Biomass renewable sources.

None of the studies evaluated the quality energy benefits of Biomass. The E3 study referenced Biomass as a renewable, but then dropped it from further evaluation. All of the other studies (E3, Brattle and Aspen) ignored Biomass completely and, thus, failed to assess the impacts mandated by the legislation such as economic, jobs, disadvantaged communities, environmental issues, reliability, etc. All four studies are fatally flawed to the point that they cannot support any determination of allocations for the RPS.

### 2. Please organize comments on the study on the following topic areas:

- a. The 50% renewable portfolios in 2030
- b. The assumed regional market footprint in 2020 and 2030
- c. The electricity system (production simulation) modeling
- d. The reliability benefits and integration of renewable energy resources
- e. The economic analysis
- f. The environmental and environmental justice analysis

Comment:

- Studies fail to present and evaluate a diversified basket of sources in contravention of the plain directives of the legislature. Specifically, biomass was ignored completely and each of the required analyses in a – f above fundamentally failed to assess Biomass.
- Furthermore, the studies provided NO rationale for the exclusion of Biomass.
- Biomass supports substantial direct and indirect employment, including in disadvantaged communities. Yet, by ignoring Biomass, the studies fail to evaluate the positive impacts on employment and the tax base.
- Following years of beetle infestation and drought, California is facing a crisis in forest management and facing extreme needs for forest thinning mitigate fire risk and to increase carbon absorption and water resource protection. However, by ignoring Biomass, the studies fail to evaluate the positive impacts of Biomass in addressing the forest management needs.

**3. Other**

Comment: For the reasons stated above the studies are fundamentally flawed and should be either disregarded or instruction should be given that the studies be expanded to include a complete analysis of Biomass, including the impacts on addressing the state of the forests.