

February 4, 2025

The Honorable Alice Reynolds, President
The Honorable John Reynolds, Commissioner
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

RE: ACWA Comment Letter regarding need to extend the Bioenergy Feed-in Tarriff Program

Dear President Reynolds and Commissioner Reynolds:

The Association of California Water Agencies (ACWA) requests that the California Public Utilities Commission (CPUC) extend the Bioenergy Feed-in Tarriff Program (BioMAT), beyond the end of 2025. ACWA represents approximately 470 local public water agencies that supply water for domestic, agricultural, and industrial uses to over 90 percent of California's population. Several of our agencies are partnering with BioMAT project developers and other water and wastewater agencies will consider developing additional BioMAT projects if the program is extended. BioMAT projects provide many important benefits to water and wastewater facilities, and particularly those in forested areas. These include providing: a source of reliable baseload electricity and heat, catastrophic wildfire mitigation which not only helps protect the expensive infrastructure we have in place but enables us to continue to provide services in the face of wildfire, a rationale for improved forest stewardship which increases the supply of ground water.

Extending BioMAT will help water and wastewater agencies to achieve numerous important objectives, including:

- BioMAT projects will increase energy reliability for water and wastewater agencies, which provide essential public health and safety functions, by providing clean firm power;
- Converting forest waste to electricity helps to mitigate wildfire risks and impacts, which in turn protects water supplies, water quality, hydropower production, and electricity and water infrastructure in forested regions;
- BioMAT projects will help water agencies maintain service during wildfire and other extreme events; and

- Biochar produced from BioMAT gasification projects can also be used for water filtration and purification at wastewater treatment plants, further protecting public health;
- Increasingly conversion technologies offer solutions for destruction of PFAS while biosolids are converted into energy that address new concerns about land application of potentially contaminated biosolids; and
- Provide alternatives to the increasingly expensive trucking of biosolids great distances for proper disposal.

Several of our agencies are currently developing BioMAT projects and many more agencies would consider developing BioMAT projects if the program is extended. We believe that these projects will provide significant benefits, including direct benefits from wildfire mitigation and more reliable power and water supplies, that far outweigh the costs. We urge the CPUC, therefore, to extend the BioMAT program and consider additional changes to accelerate participation in the program.

We submit these comments in coalition with similar comments that you may receive from the Bioenergy Association of California.

Thank you for your consideration of these important issues. If you have any questions regarding these comments, please contact us at NickB@acwa.com or (916) 669-2377.

Sincerely,

Nick Blair

Nick Blair
Senior Policy Advocate
Association of California Water Agencies