

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop
Additional Methods to Implement the California
Renewables Portfolio Standard Program.

Rulemaking 06-02-012
(Filed February 16, 2006)

**COMMENTS OF THE CALIFORNIA WASTEWATER CLIMATE
CHANGE GROUP ON THE PROPOSED DECISION**

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For the California Wastewater Climate Change
Group

Date: January 19, 2010

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Additional Methods to Implement the California
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Pursuant to Rule 14.3 of the Commission's Rules of Practice and Procedure, the California Wastewater Climate Change Group (CWCCG) submits its comments on the Proposed Decision of Administrative Law Judge Anne E. Simon, issued on December 23, 2009. The Proposed Decision authorizes use of Tradable Renewable Energy Credits (TREC)s for compliance with the California Renewables Portfolio Standard (RPS).

CWCCG urges the CPUC to adopt the Proposed Decision of ALJ Simon on the matter of Use of Renewable Energy Credits for Compliance with the California Renewables Portfolio Standard.

CWCCG's mission is to address climate change policies, initiatives, and challenges through a unified voice advocating for California wastewater community perspectives. Together, CWCCG treats over 90% of the municipal wastewater in California, including beneficial use of products such as biosolids and biogas.

Wastewater agencies across the state are in the process of developing and implementing renewable energy projects. These projects form a cornerstone of the distributed generation that will be needed in California to reach RPS goals. A TREC market would provide much-needed incentives for our agencies to expand renewable energy generation at our facilities. Revenue from TRECs may tip the economic balance to make additional projects viable. The sooner a TREC market is established, the sooner additional renewable energy projects will move forward, so we request that CPUC move quickly to adopt this decision and begin implementation.

Further, we urge CPUC to foster statewide collaboration among the California Energy Commission (CEC), California Air Resources Board (CARB), and local air districts across California to eliminate barriers and disincentives to development of renewable distributed generation.

We appreciate the opportunity to express our support for the development of a TREC market in California. Please contact the undersigned if you have any questions. We would welcome the opportunity to meet with you to further discuss the wastewater community's position on these issues.

Respectfully submitted this 19th day of January, 2010 at Oakland,

California.

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By  _____

For the California Wastewater Climate
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0360/001/X115794.v1

CERTIFICATE OF SERVICE

I, Linda Chaffee, certify that I have on this 19th day of January 2010 caused a copy of the foregoing

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to be served on all known parties to R.06-02-012 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 19th day of January 2010 at San Francisco, California.

/s/ Linda Chaffee
Linda Chaffee

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Last Updated January 15, 2010

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