July 27, 2020

The Honorable Ben Hueso, Chair
Senate Energy, Utilities and Communications Committee
State Capitol, Room 4035
Sacramento, CA 95814

RE: AB 3163 (Salas): Biomethane – SUPPORT

Dear Senator Hueso,

The California Association of Sanitation Agencies (CASA) supports AB 3163 (Salas), as amended on May 5, 2020. CASA is a statewide organization of over 125 public agencies that provide wastewater collection and treatment, recycled water, biosolids management, and renewable energy services to millions of Californians.

Wastewater treatment plants generate a steady and reliable stock of biogas through the anaerobic digestion of sewage sludge, an integral part of the wastewater treatment process. The utilization of the methane fraction of biogas for injection to the common carrier pipelines is an attractive option for many agencies. Wastewater treatment operators are also evaluating the benefits of using emerging technologies for sewage sludge and biosolids management, such as pyrolysis and gasification.

AB 3163 would allow for the methane resulting from the non-combustion thermal conversion of sewage sludge and biosolids to be eligible for pipeline injection. This expansion of eligibility for feedstocks would allow agencies interested in this technology to pursue more comprehensive projects, resulting in increased environmental and ratepayer benefits.

The provisions in AB 3163 provide an appropriate expansion of eligible feedstocks for producing pipeline grade biomethane. However, we believe future statutory changes are necessary in order for wastewater agencies to be able to utilize these conversion technologies more broadly to meet other important and pressing regulatory obligations. We look forward to continuing the conversation to that end.

For these reasons we support the narrow and appropriate expansion of eligibility for these important feedstocks and look forward to working with the author and committee as this policy progresses. We would be happy to provide clarification or discuss our comments further.

Sincerely,

Jessica Gauger
Director of Legislative Advocacy & Public Affairs

CC: Assembly Member Rudy Salas