



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

**FILED**

11/21/25

04:59 PM

A2510008

Application Of Southern California  
Gas Company (U 904 G) Proposing  
Woody Biomass Pilot Project

Application 25-10-008

**BIOENERGY ASSOCIATION OF CALIFORNIA RESPONSE TO  
APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)  
PROPOSING WOODY BIOMASS PILOT PROJECT**

DATED: November 21, 2025

JULIA A. LEVIN  
Executive Director  
Bioenergy Association of California  
PO Box 6184  
Albany, CA 94706  
Phone: 510-610-1733  
Email: [jlevin@bioenergyca.org](mailto:jlevin@bioenergyca.org)

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

Application Of Southern California  
Gas Company (U 904 G) Proposing  
Woody Biomass Pilot Project

Application 25-10-008

**BIOENERGY ASSOCIATION OF CALIFORNIA RESPONSE TO  
APPLICATION OF SOUTHERN CALIFORNIA GAS COMPANY (U 904 G)  
PROPOSING WOODY BIOMASS PILOT PROJECT**

**I. INTRODUCTION**

The Bioenergy Association of California (BAC) submits this Response in accordance with Rule 2.6 of the Commission's Rules of Practice and Procedure. BAC strongly supports SoCalGas' Application for a woody biomass pilot project as it will help meet the state's climate change, air quality, sustainable agriculture, waste reduction, jobs and economic goals. In particular, it will accelerate progress and further the goals of the following statutes and plans:

- SB 1383 (Lara, 2016) – the state's Short-Lived Climate Pollutant (methane and black carbon) reduction law – and the *California Short-Lived Climate Reduction Strategy*, both of which call explicitly for more biogas and biomethane production;

- The Air Board's *2022 Climate Change Scoping Plan*, which calls for increased bioenergy with carbon capture and sequestration to generate carbon negative emissions needed to reach carbon neutrality, as required by AB 1279 (Muratsuchi, 2022);
- The California Air Resources Board's plan to phase out open burning of agricultural waste and recommendation to increase bioenergy as an alternative;
- California's wildfire mitigation and forest restoration goals, as adopted in SB 901 (Dodd, 2020), the *California Forest Carbon Plan*, and the Board of Forestry's *Wood Utilization Plan*; and
- The Governor's *California Jobs First* plans, which recommend increasing bioenergy and carbon capture and sequestration to generate good paying, permanent jobs and build a circular economy in agricultural and other regions.

SoCalGas' proposed pilot project will further each of these goals, as described more fully below.

## II. **BIOENERGY ASSOCIATION OF CALIFORNIA**

BAC represents almost 100 members that are converting organic waste to energy to meet the state's clean energy, climate change, wildfire reduction, landfill reduction, and circular economy goals. BAC's public sector members include cities and counties, Tribes, air quality and environmental agencies, waste and wastewater agencies, public research institutions, environmental and community groups, and a publicly owned utility. BAC's private sector members include energy and technology companies, waste haulers, agriculture and food processing companies, investors and consulting firms, and an investor-owned utility.

BAC has been actively involved in pipeline biomethane issues since the association's founding in 2012. BAC members and staff participated in the development and enactment of AB 1900 (Gatto, 2012),<sup>1</sup> the legislation that created Rulemaking 13-02-

---

<sup>1</sup> AB 1900 (Gatto), Statutes of 2012, Chapter 602.

008, and the development and implementation of SB 1440 (Hueso, 2018),<sup>2</sup> which led to the Commission's adoption of a pipeline biomethane procurement program and the requirement to include woody biomass to biomethane pilot projects. BAC was also the sponsor of AB 3163 (Salas, 2020),<sup>3</sup> the legislation that expanded eligible pipeline biomethane to include biomethane produced from woody waste biomass.

BAC has several members that are developing or operating pipeline biomethane projects in California, including members that are interested in developing woody biomass to pipeline biomethane projects. One of BAC's members - West Biofuels, LLC - is the project developer that SoCalGas chose to develop the pilot project that is the subject of this Application. Other BAC members are considering developing biomass to pipeline biomethane projects as well and so are very interested in the outcome of this proceeding to determine what sort of projects will be considered and approved.

### **III. SOCALGAS' PILOT PROJECT WILL ADVANCE IMPORTANT STATE POLICIES AND INTERESTS.**

SoCalGas' proposed pilot project will further many important state laws and policies, including the following.

#### **A. The Pilot Project Will Reduce Short-Lived Climate Pollutant Emissions, Which is The Most Urgent Climate Solution and Required by State Law.**

SoCalGas' proposed pilot project will further the requirements of SB 1440 and SB 1383 by reducing emissions of the climate super pollutants methane and black carbon, also known as Short-Lived Climate Pollutants. The pilot project will reduce these emissions by converting woody biomass to biomethane instead of open burning or pile and decay of that agricultural and forest waste.

SB 1383 requires a 40 percent reduction in methane and a 50 percent reduction in black carbon by 2030.<sup>4</sup> SB 1383 also calls on state agencies to adopt policies and

---

<sup>2</sup> SB 1440 (Hueso), Statutes of 2018, Chapter 739.

<sup>3</sup> AB 3163 (Salas), Statutes of 2020, Chapter 358.

<sup>4</sup> Health and Safety Code section 39730.5.

incentives to “significantly increase the sustainable production and use of renewable gas, including biomethane and biogas.”<sup>5</sup> And SB 1383 calls specifically on the Commission to consider adopting additional policies to “support the development and use in the state of renewable gas, including biomethane and biogas, that reduce short-lived climate pollutants in the state.”<sup>6</sup> As the Legislature said in SB 1383, reducing these climate super pollutants will “have an immediate beneficial impact on climate change and on public health.”<sup>7</sup> The Air Board has underscored the importance of converting organic waste to pipeline biomethane in the *California Short-Lived Climate Pollutant Reduction Strategy*:

“The State's organic waste should be put to beneficial use, such as for . . . pipeline-injected renewable natural gas. . . important environmental, health, and economic benefits may be most realized in disadvantaged communities by prioritizing pipeline injection of renewable natural gas.”<sup>8</sup>

According to the California Environmental Protection Agency, converting agricultural or forest waste to bioenergy cuts both black carbon and methane emissions by 98 percent compared to pile burning or wildfires.<sup>9</sup> Converting woody biomass to energy also cuts harmful air pollutants such as particulate matter, carbon monoxide and NOx significantly as well.

SoCalGas’ woody biomass pilot project will reduce methane and black carbon emissions from open burning or pile and decay of agricultural residues, thereby furthering the requirements of SB 1383 and other climate laws.

## **B. The Pilot Project Will Help California to Achieve Carbon Neutrality, as Required by State Law.**

SB 1279 (Muratsuchi, 2022) sets a statewide goal of carbon neutrality by mid-century. The California Air Resources Board (CARB) and climate scientists generally agree that

---

<sup>5</sup> Health and Safety Code section 39730.8(c).

<sup>6</sup> Health and Safety Code section 39730.8(d).

<sup>7</sup> SB 1383 (Lara, 2016), Section 1(a)(4).

<sup>8</sup> California Air Resources Board, *Short-Lived Climate Pollutant Reduction Strategy*, adopted March 2017 at pages 3 and 125.

<sup>9</sup> *California Forest Carbon Plan*, adopted by CalEPA, the California Natural Resources Agency and CalFire in 2018, at pages 130 and 135.

achieving carbon neutrality will require significant generation of carbon negative emissions to offset climate pollution that cannot be eliminated.<sup>10</sup> Both CARB and Lawrence Livermore National Lab have also concluded that bioenergy with carbon capture and sequestration (BECCS) provides the single largest potential for carbon negative emissions in California.<sup>11</sup> In fact, Lawrence Livermore National Lab found that BECCS could provide two-thirds of all the carbon negative emissions needed for California to meet the goal of carbon neutrality and that most of that BECCS would be generated from forest and agricultural waste, as proposed in the SoCalGas pilot project.<sup>12</sup>

If approved, SoCalGas' pilot project will generate carbon negative emissions needed to reach carbon neutrality and will provide an important model for other projects to learn from and replicate.

### **C. The Pilot Project Will Help to Reduce Pile and Decay or Open Burning of Agricultural Waste, as Required by CARB.**

In 2021, CARB adopted a plan to phase out open burning of agricultural waste in the San Joaquin Valley.<sup>13</sup> That plan calls specifically for increased bioenergy production as a beneficial alternative to open burning.<sup>14</sup> As CARB found, converting agricultural waste to gaseous fuels can help the state meet its climate goals.<sup>15</sup> CARB concluded that:

“These low-carbon fuels will be critical to decarbonizing our transportation sector . . . As the State pushes towards carbon neutrality these fuels will also have applicability beyond transportation such as the industrial sector or decarbonizing the natural gas grid and electricity sector. Using biomass-based feedstocks, such as agricultural residues, in the production of these fuels can help reduce a fuel's carbon intensity. When appropriately designed, a renewable fuel production facility that utilizes agricultural residue that would otherwise be open burned can

---

<sup>10</sup> See, CARB's *2022 Climate Change Scoping Plan for Carbon Neutrality*; Lawrence Livermore National Lab, *Getting to Neutral – Options for Negative Carbon Emissions in California*, January 2020. LLNL-PRES-795982.

<sup>11</sup> *Id.*

<sup>12</sup> LLNL report, above, at page 2.

<sup>13</sup> California Air Resources Board, *San Joaquin Valley Agricultural Burning Assessment*, adopted February 25, 2021.

<sup>14</sup> *Id.* at pages 9-10.

<sup>15</sup> *Id.* at page 10.

help reduce greenhouse gas and criteria pollutant emissions, waste, and fossil fuel dependence, while supporting local economies.”<sup>16</sup>

SoCalGas’ pilot project will directly support the phase-out of open burning of agricultural waste by providing a beneficial alternative to open burning. As such, the project will reduce emissions of air and climate pollution, protecting public health and safety.

SoCalGas’ pilot project will also reduce pile and decay of agricultural residues and whole orchard recycling, which are alternatives to open burning that still emit significant amounts of methane emissions as the agricultural residues decompose.

#### **D. The Pilot Project Will Provide a Valuable Model for Forest Waste Utilization, Helping to Mitigate Wildfires.**

SoCalGas’ proposed pilot project is focused on agricultural residues, primarily from almond orchards, but it will also benefit the forest sector by demonstrating the feasibility and benefits of woody biomass conversion to pipeline biomethane. Converting forest residues to pipeline biomethane is an wildfire mitigation strategy that will save ratepayers funding by reducing the costs of wildfire mitigation, wildfire damages, increased insurance costs, impacts on water supply and quality, and the public health impacts of wildfire. California’s *Forest Carbon Plan* and the Board of Forestry’s *Wood Utilization Plan* both call for increased bioenergy from forest waste as a way to mitigate wildfires and reduce pile burning of forest residues (as well as agricultural residues).<sup>17</sup> In fact, the Board of Forestry’s *Wood Utilization Plan* calls specifically on the Commission to take steps to facilitate conversion of forest waste to pipeline biomethane.<sup>18</sup>

SoCalGas’ pilot project will help to address California’s wildfire crisis and will save ratepayers money by demonstrating a beneficial pathway that can be used to mitigate wildfires and pile burning by converting woody biomass to pipeline biomethane instead.

---

<sup>16</sup> Id.

<sup>17</sup> *Joint Institute Recommendations to Expand Wood and Biomass Utilization in California*, adopted by the California Board of Forestry in November 2020, at pages 14-19.

<sup>18</sup> Id. at pages 16-17.

### **E. SoCalGas' Pilot Project Will Further the Governor's *California Jobs First* Goals.**

In addition to providing important climate and air quality benefits, SoCalGas' pilot project will further the goals of the Governor's *California Jobs First* initiative. The Governor's *California Jobs First* initiative is focused on increasing good jobs that support a circular economy, build strong families and communities, and further the state's climate and clean energy goals. The statewide plans is based on 13 regional plans,<sup>19</sup> at least six of which call for increased bioenergy, including the plans for the Central San Joaquin Valley (p. 28), North State (p. 16), Eastern Sierra Nevada (p. 100), Redwood Coast (p. 62) Kern County (p. 25), and North San Joaquin Valley (pages 36 and 39). Notably, these are the regions that represent most of California's forested and agricultural regions, which desperately need good paying, high skill and permanent jobs.

According to recent reports by the Clean Air Task Force and Rand Corporation, projects that convert organic waste to energy – like the SoCalGas pilot project – provide more jobs and a higher proportion of permanent, high paying jobs than other forms of clean energy. These are the sorts of jobs promoted in the Governor's *California Jobs First* plan because they provide long-term support for families and communities, especially rural communities that have fewer options for economic development.

For all these reasons, BAC strongly supports SoCalGas' Application for a woody biomass pilot project and urges the Commission to approve that Application.

DATED: November 21, 2025

Respectfully submitted,  
\_\_\_\_\_  
/s/ Julia A. Levin

JULIA A. LEVIN  
Executive Director  
Bioenergy Association of California  
PO Box 6184  
Albany, CA 94706  
510-610-1733  
jlevin@bioenergyca.org

---

<sup>19</sup> <https://jobsfirst.ca.gov/>



## **VERIFICATION**

I am a representative of the non-profit organization herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and, as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 21<sup>st</sup> day of November, 2025 in Kensington, California.

*/s/ Julia A. Levin*

---

JULIA A. LEVIN  
Executive Director  
Bioenergy Association of California  
PO Box 6184  
Albany, CA 94706  
510-610-1733  
jlevin@bioenergyca.org