

**From:** Tom Price <tom@allpowerlabs.com>  
**Sent:** Tuesday, March 14, 2017 3:15 PM  
**To:** CALFIRE Forest Climate Advisory Team  
**Subject:** Forest Carbon Action Plan comments

Thank you for the opportunity to comment on the proposed plan. The following comments are submitted on behalf of All Power Labs, a designer and manufacturer of compact biomass gasification power plants.

We compliment the authors on this comprehensive, fully developed analysis, and for the purposes of brevity won't specifically call out all the areas of agreement—there are simply too many! Please share with your team our congratulations on such an authoritative body of work.

We believe smaller, community scale systems such as the ones we and others make can help create better linkages between forest resources and opportunities for use, and submit our comments with that in mind.

Section 8.1 Makes reference to a value of \$.10 per kWh of environmental benefits, and references a report from 1999. This value is also attributed elsewhere in the report. The plan should call for updating that information with best available values, and recommend the CPUC recognize and reflect those values in forest bioenergy contracts, in order to better facilitate the expedient scaled growth of these projects.

Section 9.2 Plan currently states that "a facility must be managed specifically for its [biochar's] production". The plan should be clear that in fact biochar and bioenergy can be co-produced through the processes of biomass gasification, and that the state has a role in helping ensure monetization of these products so the nascent market can be developed.

Section 9.3 Makes reference to energy from biomass. The unique attribute of biomass gasification with regards to energy generation is that it is the only known form of net carbon negative energy, and the only form of dispatchable renewable energy that isn't weather specific. The plan should recommend that the CPUC consider these unique characteristics and their ability to address multiple and sometimes conflicting renewable energy, environmental, and public health goals of the state.

Tom Price  
Director of Strategic Initiatives  
M 801-712-5371  
Skype thumper897  
[www.allpowerlabs.com](http://www.allpowerlabs.com)