

**Marguerite McLean**

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**From:** JMax905475@aol.com  
**Sent:** Tuesday, September 02, 2008 3:45 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** Docket number 080503-EL  
**Attachments:** re draft RPS.doc

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b) docket number 080503-EL

c) Waste Energy Solutions

d) 1 document 1 page

e) document attached refers to price of RECs and value of anaerobic digestion

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## Regarding Draft RPS

1. On page 9 line 3 – 4

3) Initially, the price of each renewable energy credit shall be capped at the equivalent of \$16 per ton of net greenhouse gas emissions (GHG) reduced by Florida renewable energy resources relative to the GHG emissions otherwise emitted by the utility.

2. Some greenhouse gasses such as methane are considered to be much worse in contributing to climate change. Methane is given a value of over 21 times that of carbon dioxide on the Chicago Climate Exchange.
3. If you are going to base the price of RECs on reduction of GHG than it is only fair to take into consideration the effectiveness of the gas reduction. I think the statement should be as follows –

3) Initially, the price of each renewable energy credit shall be capped at the equivalent of \$16 per ton of net carbon dioxide emissions or the equivalent in other green house gasses reduced by Florida renewable energy resources relative to the GHG emissions that would otherwise occur

4. According to the CCX 1 ton of carbon dioxide is equivalent to 21 tons of methane.
5. If a utility produces electricity from methane produced from anaerobic digestion there is a much greater benefit than just preventing carbon dioxide emissions from burning equivalent amounts of fossil fuel because the methane that otherwise would be released into the atmosphere from rotting organic matter is destroyed. Therefore the value allowed for renewable credits for destroying methane from anaerobic digestion should be greater than for merely preventing emission of carbon dioxide from fossil fuel.
6. Also since statute 366.92 allows giving added weight to solar and wind (without stating why this should be done). It is clear that energy from anaerobic digestion has many environmental attributes that should qualify this form of renewable energy for “added weight”

s/Jane Maxwell

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