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Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: "Third Notice of Public Availability of Modified Text and Availability of Additional Documents and Information for the Amendments to the Low Carbon Fuel Standard Regulation."

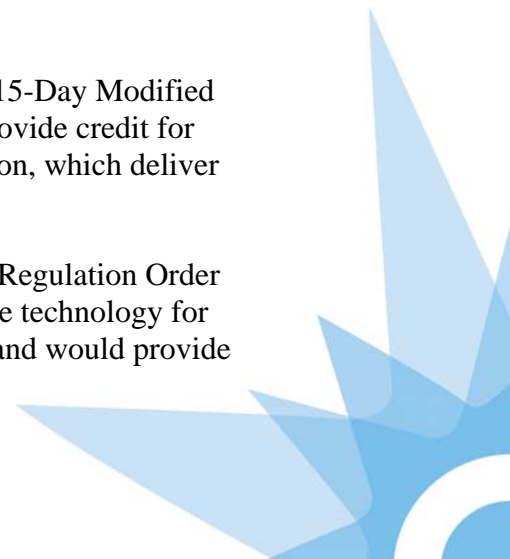
GlassPoint is a California company that manufactures solar steam generators for the oil and gas industry. GlassPoint's industrial solar steam systems are designed specifically to operate in harsh oilfield environments and deliver class-leading price-performance. With headquarters in Fremont, California, and regional offices in Bakersfield, Shenzhen, and Muscat, GlassPoint is leading the commercial deployment of solar enhanced oil recovery (EOR) globally. GlassPoint commissioned the world's first commercial solar EOR unit in February 2011 in McKittrick, California, and today is completing the Middle East's first solar EOR installation in southern Oman.

Enhanced oil recovery delivers over 40% of California's oil output, and is providing a growing portion of California production. Steam needs for EOR today are a primary source of stationary source CO₂ emissions in California, and account for over 20% of total carbon intensity in thermally produced crudes. Solar EOR substantially reduces or eliminates the need to burn fuel to supply the steam needed for enhanced oil recovery, and can reduce total emissions associated with oilfield steam by 15 to 50%. Solar EOR projects can deliver long-term cost savings for oil producers in California, and help maintain California's technology and economic leadership in the energy sector.

GlassPoint commends the Air Resources Board for adopting the Low Carbon Fuel Standard (LCFS) and establishing market-based mechanisms to achieve reductions in the carbon emissions of liquid transportation fuels. In addition, we appreciate the Air Resources Board and staff for continuing to work in the development of the Carbon Intensity Lookup table and guidelines for establishment of pathways to comply with the Low Carbon Fuel Standard.

GlassPoint strongly supports the mechanisms proposed in the Third 15-Day Modified Regulation Order for the Low Carbon Fuel Standard, which could provide credit for innovative crude production methods, including solar steam generation, which deliver reductions in carbon intensity.

The specific mechanism incorporated in the Third 15-Day Modified Regulation Order would provide market-based returns to those who invest in innovative technology for reducing emissions, supporting the deployment of such technology, and would provide





further indirect benefits to all producers and users of transportation fuels in California which include:

- The establishment of lower-cost pathways for achieving LCFS compliance
- Reductions in the blended-average intensity score of California petroleum
- Reductions of the local costs and impacts associated with combustion emissions.

We look forward to working with ARB staff to help implement the Low Carbon Fuel Standard, achieve or exceed the goals of AB 32, and maintain California as the world leader in the deployment of advanced energy technologies.

Sincerely,

/s/ John O'Donnell
Vice President, Business Development