

## **Topic 5 (Ultralow Carbon Fuels) Comments**

### **B. Availability of Ultralow Carbon Fuels, 1. Cellulosic Ethanol**

#### **Comment**

**Cellulosic ethanol section should be expanded to include a description or discussion as to the reasons that may be contributing to a lack of progress regarding commercial-scale availability for cellulosic ethanol.**

#### **Comment**

**List of cellulosic ethanol plants should be provided to the LCFS Advisory Panel members and include the following specific information per facility:**

- **Facility name**
- **Location**
- **Status – operational, under construction, or planned**
- **Maximum production capacity**
- **Feedstock type(s)**

### **B. Availability of Ultralow Carbon Fuels, 5. Electricity and Hydrogen**

#### **Comment**

**Section should be expanded to include a discussion as to which stakeholders (utilities, vehicle manufacturers, or infrastructure equipment providers) would be generating and retaining tradeable credits under the LCFS program or a discussion of the mechanism by which these tradeable credits would be apportioned among the various stakeholders.**

## **Low Carbon Fuel Standard Advisory Panel Draft Workplan – Version 1**

### **B. Topic 2: Compliance Schedule, 2. *Questions to Address as Part of Evaluation***

#### **Comment**

**Should include additional bullet that reads “What implications would adjusting the compliance schedule have on estimated fuel costs for California consumers”.**

### **F. Topic 6: Supply and Commercialization, 1. Regulatory text, 95489.a.6**

#### **Comment**

**Text should be modified as follows:**

**The scope of each review shall include, at minimum, consideration of the following areas: (6) an assessment of supply availabilities and the rates of commercialization of fuels, infrastructure and vehicles.**

F. Topic 6: Supply and Commercialization, 3. Approach

**Comment**

**Last sentence of paragraph should be modified as follows:**

**Staff will access data from the following sources: Energy Information Administration for data related to currently availability of fuels, CEC for data related to funding, U.S. EPA for information on RFS2 development, the ~~Board of Equalization~~ CEC for information on current use of fuel in California, auto manufacturers on the development of vehicle technology, and other ARB sections who are developing other regulations that will incentivize bringing fuels/vehicles/infrastructure into the market.**

K. Topic 11: Hurdles or Barriers, 2. Questions to Address as Part of Evaluation

**Comment**

**Should include additional bullet that reads “What are the assumed time lines to obtain permits and complete construction for biorefineries and associated distribution infrastructure, inside and outside of California by type of alternative fuel”.**