



Shell Oil Products US
909 Fannin Street
Room 522A
Houston, TX 77252-2463
United States of America

Via Electronic Submittal

March 11, 2011

CARB LCFS Advisory Panel portal - **lcsadvpanmembers-ws**

Re: Priority Issues For LCFS Advisory Panel

Shell Oil Products US appreciates the opportunity to provide input concerning priority issues for the LCFS Advisory Panel to consider. We believe it is important for the panel to discuss these issues early in the process to determine an appropriate methodology to ensure that the analysis is robust.

- 1) Whether adjustments to the compliance schedule are needed (#2).¹ To determine this, a thorough analysis of the following will be necessary:
- 2) An assessment of supply availabilities and rates off commercialization of fuels and vehicles thus far and into the future (#6);
- 3) Advances in fuels and production technologies, including the feasibility and cost effectiveness of such advances thus far and into the future (#4);
- 4) The LCFS program's impact on the State's fuel supplies now and into the future (#7); and
- 5) Significant economic issues; fuel adequacy, reliability, and supply issues now and into the future (#12).

If you have any questions concerning these comments please call me at 713.230.5147.

Sincerely yours,

/s/ John E. Reese

John E. Reese
Fuels Product Management Advisor, NA

¹ Numbers in parentheses refer to section 95489 of the LCFS regulations.