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Richard Corey
Chief, Research & Econ Studies
California Air Resource Board
Headquarters Building
1003 I Street
Sacramento, CA 95814

Richard Corey:

Clean Energy Systems, Inc is pleased to submit the following comments in response to your report titled "Proposed Early Actions to Mitigate Climate Change in California."

In summary, our comments address an additional opportunity to reduce GHG and PM 10 emissions by 3.7-10.5 MMT CO₂E/yr and 121-374 tons/yr, respectively, depending upon the implementation schedule. These reductions are approximately 25-50 percent of the Group 2 Total Reductions identified in your report. To achieve these reductions by the year 2020, the State needs to implement the necessary programs that will result in the use of "climate neutral" combustion for a portion of the electric energy produced by our electric utilities. This technology uses liquid and gas hydrocarbon or renewable fuels as the power plant fuel and then permanently sequesters the CO₂ and other emissions in one or more enhanced oil recovery (EOR) projects.

The IPCC Special Report on Carbon Dioxide Capture and Storage documents the vital role that Carbon Capture Storage (CCS) can play in reducing CO₂ emissions; along with other techniques such as renewable energy and improved efficiency. In each case analyzed by the IPCC, CCS contributes around a quarter of the emission reductions required to control global warming. Under their MiniCAM scenario, the IPCC estimates that, by the year 2020, CCS can contribute an equal or greater amount than that provided by renewable energy, conservation and energy efficiency.

The California Energy Commission has funded the development of this technology. Projects using CCS are underway in Norway, Netherlands, Canada, Germany, France, Australia and the Middle East. With California taking a global leadership role in climate change mitigation, it needs to implement a program whereby a portion of its power is generated using CCS technology.

We appreciate the opportunity to submit our comments to the ARB. We will be pleased to meet with you, at your convenience, to further discuss the most effective means to introduce "climate neutral" electric generation into the California power plant portfolio.

Sincerely,

Leonard Devanna
Executive Vice President

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