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Ms. Katrina Sideco
Air Resources Engineer, Fuels Section
California Air Resources Board
1001 I Street
Sacramento, CA 95814

July 25, 2014

Dear Ms. Sideco:

GlassPoint appreciates and supports ARB's continuing efforts to modify the Low Carbon Fuel Standard (LCFS) to create a regulatory framework that works for all stakeholders. We are pleased to provide these comments in response to the July 10, 2014 public workshop on proposed revisions to the LCFS.

GlassPoint strongly supports the following proposals made at the workshop:

- **Updated Scoring** aligned with other pathways in calculating "default scores" per barrel of solar steam;
- **Recognition of alternate uses** of solar energy for heating and preheating.
- **Removal of "maximum credit"** and the uncertainty it created

GlassPoint would like to express concern about the following issues:

- **Timeline:** The changed timeline proposed at today's board meeting creates challenges for customers and project developers to harvest the benefits of the Federal solar tax incentives, which expire at the end of 2016. An effective 20% price increase will occur for projects which come online after that date.

We look forward to working with ARB on ways to speed up and simplify the process so that projects can capture the Federal benefits and minimize total costs.

Thank you for the opportunity to comment and we look forward to continuing to work with ARB.

Sincerely,

John O'Donnell
Vice President, Business Development

