

From: [Chris Bliley](#)
To: [Lai, Ursula@ARB](mailto:Lai_Ursula@ARB)
Subject: Growth Energy Feedback on the Proposed Framework for the LCFS Verification Program
Date: Monday, March 21, 2016 12:49:11 PM

Ursula,

Thank you for holding the public workshop on the Low Carbon Fuel Standard (LCFS) on March 8th. As you know, Growth Energy represents 90 ethanol producers and thousands of ethanol supporters around the country meeting our nation's and California's need for renewable fuel. We appreciate this opportunity to provide comment on the proposed mandatory verification program that was outlined in the workshop. Our concerns with the program, as described at the workshop, are threefold: first, the mandatory verification program is unnecessary and unduly burdensome given the already numerous requirements for biofuel producers to demonstrate compliance with both the federal Renewable Fuel Standard (RFS) as well as with the LCFS. These include, but are not limited to, annual attestation engagements under the RFS, the U.S. EPA's Quality Assurance Program (which, while voluntary, it has become a market necessity for most producers), and pathway approval and certification under the LCFS.

Second, the third party verification program as outlined would only further burden small renewable fuel producers to fill a need that, as yet, has not been demonstrated. We understand that for the integrity of the regulatory program as well as for obligated parties' peace of mind, a degree of certainty regarding fuel compliance is necessary; however, the agency has not explained why the significant investments already made by our industry, the safeguards put into place by the obligated parties, as well as the numerous other regulatory requirements are insufficient to serve this purpose. We encourage CARB to consider the significant burdens already placed upon renewable fuels producers before finalizing the mandatory verification program.

Third, our members would also have concerns about potential further public disclosure of confidential business information. Many of our members have made significant investments in their plants and processes to compete in the highly competitive fuel marketplace. Public disclosure of these processes, beyond what is necessary for compliance purposes, would be detrimental to our members, and must be safeguarded against. .

Thank you in advance for your consideration of our comments on the proposed mandatory verification program. If you have any further questions, please contact me.

Sincerely,

Chris Bliley
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