



ADDRESS
GlassPoint Solar, Inc.
47669 Fremont Blvd.
Fremont, CA 94538

MAIN
+1 (415) 778-2800

FAX
+1 (415) 762-1966

WEB
www.glasspoint.com

Sam Wade
California Air Resources Board
1001 I Street
Sacramento, CA 95814

May 4, 2017

Via electronic submittal: LCFSworkshop@arb.ca.gov

Re: April 4, 2017 lifecycle update workshop

GlassPoint Solar Inc. (GlassPoint) understands and supports ARB's efforts to continue to improve the LCFS, including lifecycle emissions assessments. We are pleased to provide these comments in follow up to the April 4, 2017 workshop.

GlassPoint is a California company that develops, manufactures and finances solar steam generators for thermal enhanced oil recovery (EOR). Our renewable energy technology has proven reliable, safe and economical in field operations in California and the Middle East.

ARB's treatment of innovative crude production methods, recognizing the value of reduced emissions associated with crude oil extraction, is appreciated. The methodology includes provision of credit calculations for solar steam generation in Section 95489(d)(1)(F). The threshold values provided – from 55% to 75% steam quality – accurately track the conditions at many fields, but not all. To ensure the next generation of the regulation encompasses the breadth of different operating scenarios, GlassPoint would like to request that ARB add threshold values for 85% and 95% steam quality as well. The inclusion of such values will more accurately track the enthalpy and emissions per barrel for some California operations.

We appreciate the breadth and depth of work which has gone into the OPGEE assessment tool. We note that OPGEE's scope does not yet include solar thermal steam generation. GlassPoint would like to request that ARB consider its inclusion among the steam generation technology options modeled.

GlassPoint strongly supports ARB's work to improve lifecycle assessment and create a workable science-based regulation. Thank you for the opportunity to provide these comments.

Sincerely,

-s-

John O'Donnell
Vice President, Business Development

