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September 8, 2017

*Via electronic submittal:* [LCFSworkshop@arb.ca.gov](mailto:LCFSworkshop@arb.ca.gov)

Re: GlassPoint Solar Comments on LCFS Concept Paper and August 7, 2017 Pre-Rulemaking Public Meeting

GlassPoint Solar Inc. (GlassPoint) is pleased to submit these comments on both the July 24, 2017 Pre-Rulemaking Concept Paper and the August 7, 2017 Pre-Rulemaking Public Meeting presentation by ARB staff. We support ARB's continuing efforts to improve the LCFS program in general, and the Innovative Crude provisions specifically.

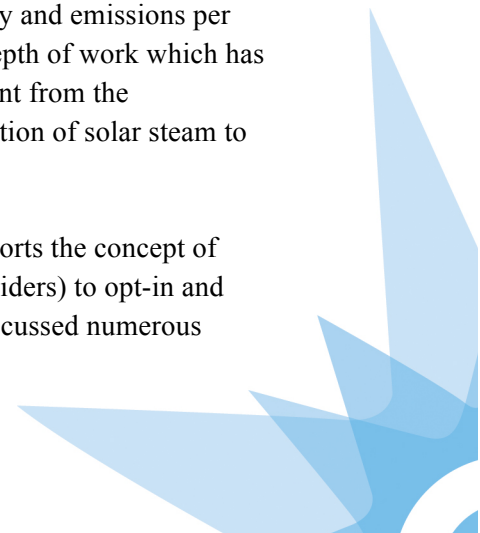
GlassPoint is a California company that develops, manufactures and finances solar steam generators for thermal enhanced oil recovery (EOR). Our renewable energy technology has proven reliable, safe and economical in field operations in California and the Middle East. We appreciate ARB's treatment of innovative crude production methods, and its recognition of the value of reducing emissions associated with crude oil extraction. We believe the innovative crude provisions are appropriate given the program's fundamental focus on fuel life cycle emissions, and provide a price signal for projects which will deliver economic growth in California while reducing both criteria pollutants and GHG emissions.

The concept paper, staff presentation, and public meeting discussion materials highlighted areas of the rule that could be improved. GlassPoint specifically supports the proposed revision to credit calculation for solar steam, including:

- The additional bins for steam quality; and
- Updated emissions values using OPGEE v2.0.

The inclusion of these additional bins will more accurately track the enthalpy and emissions per barrel for some California operations. We also appreciate the breadth and depth of work which has gone into the OPGEE assessment tool to accurately capture the energy footprint from the production, processing, and transport of crude petroleum, including the addition of solar steam to the model.

In addition to the credit calculation enhancements, GlassPoint strongly supports the concept of "allowing third-party co-applicants (e.g. solar steam or solar electricity providers) to opt-in and receive credit upon written agreement with crude producer". As we have discussed numerous





times, this simple administrative opportunity will have significant value in the commercial marketplace, particularly for projects using third-party finance.

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

cc: Jim Duffy