

## **Comment 1 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Michael

Last Name: Martin SR

Email Address: martinbrosandsonstrans@gmail.com

Affiliation: Martin Bros. & Sons Transportation

Subject: Clean Air Act

Comment:

In regards to this clean air act I support all you do I was borne and raised Oakland CA 1964 thank for the environmentalist and all to help keep California Clean, I just opened up my own trucking company and will continue to meet the guideline of this new act, if company's cant comply then stay out of California, thank you for keeping my state clean, if you need my support please give me a call Truly Michael R Martin Sr (owner) Martin Bros. & Sons Transportation LLC Dot # 3329651 MC # 1060824

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2019-10-22 18:22:13

No Duplicates.

## **Comment 2 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation:

Subject: WSPA Comments on Proposed CARB LCFS Regulation Amendments  
Comment:

WSPA Comment Letter, dated 11/11/2019, regarding the Proposed CARB  
LCFS Regulation Amendments are attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/2-lcfs2019-VyBVIANyVmQGXwJh.pdf'

Original File Name: WSPA Comment Letter\_CARB LCFS Regulation  
Amendments\_11\_11\_2019.pdf

Date and Time Comment Was Submitted: 2019-11-11 17:54:36

No Duplicates.

## **Comment 3 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: PAUL

Last Name: OESTERREICH

Email Address: POESTERREICH@USABIOENERGY.COM

Affiliation: USA BIOENERGY, LLC

Subject: LCFS CREDIT PRICE CAPS

Comment:

As a renewable fuel trader and now a part of the management team at USA BIOENERGY, LLC, I want to briefly comment on the proposed hard price cap on LCFS credits. From strictly a trader's perspective the imposition of a price cap on any commodity or tradeable credit removes the freedom of the marketplace to set the price based on supply and demand, which is a key to a market that works for everyone. If the demand is higher than the supply, the market has an incentive to find ways to generate more supply. Likewise if the market is oversupplied, it sends a signal to producers and potential producers that there is greater risk in bringing more product or credits to market and these producers make adjustments in their business or plans.

From a management team perspective of a company that is working to build and operate renewable fuel production facilities, it is counterproductive to potentially limit the financial return to a project by placing an artificial cap on one of the primary revenue streams of the business, that being LCFS credits and it threatens the viability of building the facility and bringing more low-carbon fuel to the California market. This threat against the project economics can be at least somewhat mitigated if concurrently an LCFS credit price floor of say \$150/metric tonne were to be instituted, thereby ensuring that loss of upside revenue is at least somewhat mitigated by reducing the downside risk associated with lower LCFS credit values, overall providing greater revenue certainty and increasing the odds of funding the project.

CARB must acknowledge and appreciate that the only way that additional low-carbon fuel will be produced and be brought to the California market is that a reasonable degree of certainty must exist regarding LCFS credit pricing to enable these multi-million dollar projects to be financed. Without that revenue certainty, CARB's drive to lower the GHG production within the state will likely fail for lack of available low-carbon fuel due to inadequate funding to build the necessary production facilities.

Thank you for your time.

Paul Oesterreich  
VP of Fuel Strategies  
USA BioEnergy, LLC

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2019-11-12 11:11:27

No Duplicates.

**Comment 4 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Caelin

Last Name: MacIntosh

Email Address: cmacintosh@ajw-inc.com

Affiliation: AJW, Inc.

Subject: AJW, Inc. Comments on CARB's Proposed Amendments to the LCFS

Comment:

Attached please find AJW's comments regarding CARB's proposed amendments to the LCFS.

Attachment: 'www.arb.ca.gov/lists/com-attach/4-lcfs2019-BTQBPgc3VDZWYQA0.pdf'

Original File Name: 191114 CCM Comment Letter - Board Hearing.pdf

Date and Time Comment Was Submitted: 2019-11-14 14:44:02

No Duplicates.

**Comment 5 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: CalETC

Subject: Support

Comment:

Please see the attached letter of support

Attachment: 'www.arb.ca.gov/lists/com-attach/5-lcfs2019-VjVWMVE8VmAKeFc0.pdf'

Original File Name: CalETC comment letter on CARB LCFS proposed amendments and ISOR final.pdf

Date and Time Comment Was Submitted: 2019-11-15 18:21:04

No Duplicates.

**Comment 6 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Nina

Last Name: Kapoor

Email Address: nina@rngcoalition.com

Affiliation: Coalition for Renewable Natural Gas

Subject: RNG Coalition Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Please find attached RNG Coalition's Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation

Attachment: 'www.arb.ca.gov/lists/com-attach/6-lcfs2019-V2ZRbgAwUTMAN1dv.docx'

Original File Name: 191118 RNG Coalition Comments on LCFS Cost Containment.docx

Date and Time Comment Was Submitted: 2019-11-15 19:12:52

No Duplicates.

## **Comment 7 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Jeremy

Last Name: Martin

Email Address: jmartin@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Comments from UCS and NRDC

Comment:

Please see attached comments from the Union of Concerned Scientists  
and the Natural Resources Defense Council

Attachment: 'www.arb.ca.gov/lists/com-attach/7-lcfs2019-VCFRNFUnU18Dawh6.pdf'

Original File Name: UCS NRDC comments on 2019 LCFS Rulemaking.pdf

Date and Time Comment Was Submitted: 2019-11-16 05:32:07

No Duplicates.



## **Comment 8 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Jered  
Last Name: Lindsay  
Email Address: Jered.Lindsay@sce.com  
Affiliation: SCE

Subject: Item: 19-10-04, SUPPORT Proposed Amendments to LCFS  
Comment:

Southern California Edison (SCE) appreciates the opportunity to submit comments on the proposed amendments to the Low Carbon Fuel Standard regulation. SCE's comments are attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/8-lcfs2019-WilVMFE1U18LbgJt.pdf'

Original File Name: SCE comments\_CARB Board Hearing\_LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2019-11-18 09:54:37

No Duplicates.

**Comment 9 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation: Northern California Power Agency

Subject: NCPA Comments on Proposed LCFS Amendments

Comment:

Please see the attached comments on CARB's Proposed Amendments on the LCFS regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-lcfs2019-Uz0GYwNyUmACW1U2.pdf'

Original File Name: NCPA Comments on LCFS Proposed Regulations.pdf

Date and Time Comment Was Submitted: 2019-11-18 14:29:11

No Duplicates.

## **Comment 10 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Sara

Last Name: Rafalson

Email Address: sara.rafalson@evgo.com

Affiliation: EVgo

Subject: EVgo Comments on LCFS Amendments

Comment:

EVgo appreciates the opportunity to provide feedback on the California Air Resources Board (CARB) Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/10-lcfs2019-VjNWJlcxWGQBWFQ4.pdf'

Original File Name: EVgo LCFS Comments 11.18.2019.pdf

Date and Time Comment Was Submitted: 2019-11-18 14:47:58

No Duplicates.

## **Comment 11 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments in Support of LCFS Amendments

Comment:

See attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/11-lcfs2019-WioCY1E1WVUBa1Mw.pdf'

Original File Name: PGE LCFS Comments\_11-18\_19.pdf

Date and Time Comment Was Submitted: 2019-11-18 15:16:13

No Duplicates.

## **Comment 12 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Alexandra  
Last Name: Leumer  
Email Address: alexandra.leumer@chargepoint.com  
Affiliation: ChargePoint

Subject: ChargePoint Comments on Proposed Modifications to the LCFS Regulation  
Comment:

Thank you for your consideration.

Attachment: 'www.arb.ca.gov/lists/com-attach/12-lcfs2019-BmVWOFExVHUKa1A1.pdf'

Original File Name: ChargePoint Comments on proposed LCFS modifications 11 18 19.pdf

Date and Time Comment Was Submitted: 2019-11-18 16:22:45

No Duplicates.

## **Comment 13 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Janice

Last Name: Tran

Email Address: janice@generatecapital.com

Affiliation: Generate Capital

Subject: Comments on LCFS Cost Containment

Comment:

See letter attached for comments from Generate Capital.

Attachment: 'www.arb.ca.gov/lists/com-attach/13-lcfs2019-UDddPl0yVmACdlU0.pdf'

Original File Name: Generate Capital - LCFS Cost Containment Comments.docx.pdf

Date and Time Comment Was Submitted: 2019-11-18 16:30:07

No Duplicates.

## **Comment 14 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Zach

Last Name: Franklin

Email Address: zfranklin@gridalternatives.org

Affiliation: GRID Alternatives

Subject: GRID Alternatives Comments on LCFS Amendments

Comment:

GRID Alternatives (GRID) appreciates the opportunity to submit comments on the proposed amendments to the Low Carbon Fuel Standard regulation. GRID's comments are attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/14-lcfs2019-VzACdl01AzRVDFQ1.pdf'

Original File Name: GRID Alternatives - Comments on CARB LCFS Amendments  
11.18.19.pdf

Date and Time Comment Was Submitted: 2019-11-18 17:17:29

No Duplicates.

## **Comment 15 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Mandip

Last Name: Samra

Email Address: msamra@cityofpasadena.net

Affiliation: Pasadena Water & Power

Subject: LCFS 2019

Comment:

Please find attached, Pasadena Water and Powers comments to the Amendments to the LCFS Regulation.

Attachment: 'www.arb.ca.gov/lists/com-attach/15-lcfs2019-WzdUMQNkBCRWDwd3.pdf'

Original File Name: LCFS Proposed Regulation PWP Comments 11.18.19.pdf

Date and Time Comment Was Submitted: 2019-11-18 18:05:07

No Duplicates.



## **Comment 16 for Amendments to LCFS Regulation 2019 (lcfs2019) - 45 Day.**

First Name: Frank  
Last Name: Harris  
Email Address: fharris@cmua.org  
Affiliation: CMUA

Subject: Comments of the California Municipal Utilities Association on the LCFS Proposed Regulation

Comment:

Clerk of the Board,

Please find the comments of the California Municipal Utilities Association to the Low Carbon Fuel Standard Proposed Regulation attached.

Respectfully,

Frank Harris

Attachment: 'www.arb.ca.gov/lists/com-attach/16-lcfs2019-UzAGbQN3UWNRCANv.pdf'

Original File Name: CMUA LCFS Proposed Regulation Comments.pdf

Date and Time Comment Was Submitted: 2019-11-18 20:37:32

No Duplicates.

**Comment 1 for Amendments to LCFS Regulation 2019 (lcfs2019). (At Hearing)**

First Name: Danye

Last Name: Delahoussaye

Email Address: Non-web submitted comment

Affiliation: Neste US, Inc.

Subject: Written Comment Received at Board Meeting

Comment:

See attached comment letter from Danye Delahoussaye of Neste US, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/17-lcfs2019-V2ZcYwEtUTMKPAUo.pdf](http://www.arb.ca.gov/lists/com-attach/17-lcfs2019-V2ZcYwEtUTMKPAUo.pdf)

Original File Name: 19-10-4 Danye Delahoussaye Neste.pdf

Date and Time Comment Was Submitted: 2019-11-21 13:18:56

No Duplicates.

## **Comment 1 for Amendments to LCFS Regulation 2019 (lcfs2019) - 15-1.**

First Name: Laura

Last Name: Wagner

Email Address: lwagner@portofsandiego.org

Affiliation: Port of San Diego

Subject: Comments and Suggestions on LCFS Rule

Comment:

Please see the attached comment letter from the Port of San Diego with comments and suggestions on the LCFS rule.

Attachment: [www.arb.ca.gov/lists/com-attach/18-lcfs2019-UCACawZ1V3BSC1Q7.pdf](http://www.arb.ca.gov/lists/com-attach/18-lcfs2019-UCACawZ1V3BSC1Q7.pdf)

Original File Name: Port of San Diego - LCFS2019 021320.pdf

Date and Time Comment Was Submitted: 2020-02-18 08:49:25

No Duplicates.

## **Comment 2 for Amendments to LCFS Regulation 2019 (lcfs2019) - 15-1.**

First Name: Dean

Last Name: Taylor

Email Address: Dean@calETC.com

Affiliation: California Electric Trnsprtn Coalition

Subject: CalETC comments on Feb 2020 15-day changes to LCFS

Comment:

CalETC comments attached regarding Feb 2020 15-day changes to LCFS

Attachment: [www.arb.ca.gov/lists/com-attach/19-lcfs2019-WzgCZVM+VWMFdwIq.pdf](http://www.arb.ca.gov/lists/com-attach/19-lcfs2019-WzgCZVM+VWMFdwIq.pdf)

Original File Name: CalETC comments Feb 18, 2020 on LCFS 15-day changes.pdf

Date and Time Comment Was Submitted: 2020-02-18 10:06:56

No Duplicates.

### **Comment 3 for Amendments to LCFS Regulation 2019 (lcfs2019) - 15-1.**

First Name: Emily

Last Name: Lemei

Email Address: emily.lemei@ncpa.com

Affiliation: Northern California Power Agency

Subject: NCPA Comments on Modifications to Proposed LCFS Amendments

Comment:

Please see the attached comments on CARB's 15-day language for the Proposed Amendments on the LCFS regulation.

Attachment: [www.arb.ca.gov/lists/com-attach/20-lcfs2019-VTtQNQFwADJVDFMw.pdf](http://www.arb.ca.gov/lists/com-attach/20-lcfs2019-VTtQNQFwADJVDFMw.pdf)

Original File Name: NCPA Comments on LCFS Modified Proposed Regulations.pdf

Date and Time Comment Was Submitted: 2020-02-18 11:05:43

No Duplicates.

## **Comment 4 for Amendments to LCFS Regulation 2019 (lcfs2019) - 15-1.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments on 15-Day LCFS Amendments

Comment:

See attached

Attachment: [www.arb.ca.gov/lists/com-attach/21-lcfs2019-VydRMANnV1tSOAVm.pdf](http://www.arb.ca.gov/lists/com-attach/21-lcfs2019-VydRMANnV1tSOAVm.pdf)

Original File Name: PGE LCFS 2019 Amendments 15-Day Comments\_2-18-20.pdf

Date and Time Comment Was Submitted: 2020-02-18 14:48:54

No Duplicates.

## **Comment 5 for Amendments to LCFS Regulation 2019 (lcfs2019) - 15-1.**

First Name: Badia

Last Name: Harrell

Email Address: bharrell@cityofpasadena.net

Affiliation: City of Pasadena Water and Power

Subject: Pasadena LCFS Amendment Comments

Comment:

Pasadena Water and Power would like to thank you for the opportunity to submit comments on the LCFS Proposed Amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/22-lcfs2019-AHAFdFUKUV0Ba1Ix.pdf](http://www.arb.ca.gov/lists/com-attach/22-lcfs2019-AHAFdFUKUV0Ba1Ix.pdf)

Original File Name: PWP LCFS Rulemaking Comments 02.18.20.pdf

Date and Time Comment Was Submitted: 2020-02-18 15:24:17

No Duplicates.

## **Comment 6 for Amendments to LCFS Regulation 2019 (lcfs2019) - 15-1.**

First Name: Thomas  
Last Name: Umenhofer  
Email Address: tom@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on Proposed CARB LCFS Regulation Amendments  
Comment:

WSPA comments regarding the proposed California Air Resources Board (CARB) Low Carbon Fuel Standard (LCFS) Regulation Amendments 15-day Modifications, dated February 3, 2020.

Attachment: [www.arb.ca.gov/lists/com-attach/23-lcfs2019-B3BSJwNyAjADWgdk.pdf](http://www.arb.ca.gov/lists/com-attach/23-lcfs2019-B3BSJwNyAjADWgdk.pdf)

Original File Name: WSPA Comment Letter\_CARB LCFS Regulation Amendments\_02\_18\_2020.pdf

Date and Time Comment Was Submitted: 2020-02-18 16:00:46

No Duplicates.