

**Comment 1 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Bob

Last Name: Whiteman

Email Address: BobWhiteman@PoetEP.com

Affiliation: Poet Ethanol Products

Subject: Regulatory Amendments Commentary

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/1-carb\\_lcfs\\_regulatory\\_amendments\\_commentary\\_7-30-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/1-carb_lcfs_regulatory_amendments_commentary_7-30-11.pdf)

Original File Name: CARB LCFS Regulatory Amendments Commentary 7-30-11.pdf

Date and Time Comment Was Submitted: 2011-07-29 11:28:14

No Duplicates.

**Comment 2 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: John  
Last Name: Braeutigam  
Email Address: John.Braeutigam@valero.com  
Affiliation: Valero

Subject: Comments for July 22 Workshop

Comment:

Please see attached pdf file.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/2-valero\\_lcfs\\_rugulation\\_changes\\_and\\_july\\_22\\_workshop\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/2-valero_lcfs_rugulation_changes_and_july_22_workshop_comments.pdf)

Original File Name: Valero LCFS Rugulation Changes and July 22 Workshop Comments.pdf

Date and Time Comment Was Submitted: 2011-08-05 11:41:25

No Duplicates.

**Comment 3 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Rasberry

Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)

Affiliation: State Agency Affairs Manager

Subject: Comments on July 22 Workshop

Comment:

Attached are comments on behalf of San Diego Gas and Electric on the July 22 LCFS Workshop.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/3-sdge\\_comments\\_on\\_arb\\_lcfs\\_regulation\\_amendments\\_07052011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/3-sdge_comments_on_arb_lcfs_regulation_amendments_07052011.pdf)

Original File Name: SDGE Comments on ARB LCFS Regulation Amendments 07052011.pdf

Date and Time Comment Was Submitted: 2011-08-05 13:05:51

No Duplicates.

**Comment 4 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Tamara

Last Name: Rasberry

Email Address: [trasberry@semprautilities.com](mailto:trasberry@semprautilities.com)

Affiliation: State Agency Affairs Manager

Subject: Comments from Southern California Gas Company

Comment:

Attached are comments on the July 22 LCFS Workshop filed on behalf of the Southern California Gas Company.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/4-socalgas\\_comments\\_on\\_arb\\_lcfs\\_regulation\\_amendments\\_07052011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/4-socalgas_comments_on_arb_lcfs_regulation_amendments_07052011.pdf)

Original File Name: SoCalGas Comments on ARB LCFS Regulation Amendments 07052011.pdf

Date and Time Comment Was Submitted: 2011-08-05 13:09:50

No Duplicates.

**Comment 5 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: John

Last Name: Braeutigam

Email Address: John.Braeutigam@valero.com

Affiliation:

Subject: Regulatory Amendments Commentary

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/5-valero\\_lcfs\\_rugulation\\_changes\\_and\\_july\\_22\\_workshop\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/5-valero_lcfs_rugulation_changes_and_july_22_workshop_comments.pdf)

Original File Name: Valero LCFS Rugulation Changes and July 22 Workshop Comments.pdf

Date and Time Comment Was Submitted: 2011-08-05 13:53:09

No Duplicates.

**Comment 6 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Geoff

Last Name: Cooper

Email Address: [gcooper@ethanolrfa.org](mailto:gcooper@ethanolrfa.org)

Affiliation: Renewable Fuels Association

Subject: RFA Comments re: July 22 Workshop

Comment:

See attached comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/6-rfa\\_comments\\_july\\_22\\_carb\\_workshop.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/6-rfa_comments_july_22_carb_workshop.pdf)

Original File Name: RFA Comments\_July 22 CARB Workshop.pdf

Date and Time Comment Was Submitted: 2011-08-05 15:21:19

No Duplicates.

**Comment 7 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Anthony  
Last Name: Andreoni  
Email Address: [tandreoni@cmua.org](mailto:tandreoni@cmua.org)  
Affiliation: CMUA

Subject: Comments on the Proposed LCFS Amendments - Electricity Credits  
Comment:

Please see the attached CMUA comment letter.  
Thank you.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/7-arb\\_lcfs\\_comments\\_cmua\\_final\\_08\\_05\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/7-arb_lcfs_comments_cmua_final_08_05_2011.pdf)

Original File Name: ARB\_LCFS\_Comments\_CMUA\_Final\_08\_05\_2011.pdf

Date and Time Comment Was Submitted: 2011-08-05 16:13:28

No Duplicates.

**Comment 8 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Lily  
Last Name: Mitchell  
Email Address: lmitchell@hanmor.com  
Affiliation: SCPPA

Subject: Comments of SCPPA on 7/22/11 proposed changes to LCFS Regulation  
Comment:

Please find attached the comments of the Southern California Public Power Authority on the changes to the Low Carbon Fuel Standard Regulation presented at the ARB workshop on July 22, 2011.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/8-300226001lmm08051101\\_lcfs\\_comment.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/8-300226001lmm08051101_lcfs_comment.pdf)

Original File Name: 300226001lmm08051101 LCFS comment.pdf

Date and Time Comment Was Submitted: 2011-08-05 16:32:54

No Duplicates.

**Comment 9 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: William  
Last Name: Westerfield  
Email Address: [wwester@smud.org](mailto:wwester@smud.org)  
Affiliation: Sacramento Municipal Utility District

Subject: SMUD Comments on Proposed Regulatory Changes for Low Carbon Fuel Standard Regulations  
Comment:

Attached find SMUD's Comments on Proposed Regulatory Changes for Low Carbon Fuel Standard Regulations.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/9-smud\\_comments\\_on\\_proposed\\_regulatory\\_changes\\_for\\_lcfs\\_regulations.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/9-smud_comments_on_proposed_regulatory_changes_for_lcfs_regulations.pdf)

Original File Name: SMUD Comments on Proposed Regulatory Changes for LCFS Regulations.pdf

Date and Time Comment Was Submitted: 2011-08-05 16:26:07

No Duplicates.

**Comment 10 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: Comments of SCE to CARB on LCFS Regulatory Amendments Workshop

Comment:

Attached are SCE's comments to the LCFS draft regulation.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/10-sce\\_comments\\_on\\_lcfs\\_draft\\_regulation\\_08-05-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/10-sce_comments_on_lcfs_draft_regulation_08-05-11.pdf)

Original File Name: SCE Comments on LCFS Draft Regulation 08-05-11.pdf

Date and Time Comment Was Submitted: 2011-08-05 16:22:32

No Duplicates.

**Comment 11 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Vivek

Last Name: Narayanan

Email Address: vnn2@pge.com

Affiliation: Pacific Gas & Electric Company

Subject: Comments of PG&E on LCFS proposed rulemaking

Comment:

PG&E appreciates the opportunity to provide comments on the Low Carbon Fuel Standard proposed rulemaking. Attached are the comments from PG&E on the LCFS program.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/11-pge\\_response\\_to\\_carb\\_regulation.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/11-pge_response_to_carb_regulation.pdf)

Original File Name: PGE response to CARB regulation.pdf

Date and Time Comment Was Submitted: 2011-08-08 17:07:16

No Duplicates.

**Comment 12 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation:

Subject: LCFS Comments on July 22 Workshop

Comment:

Please see attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/12-arb\\_lcfs\\_\\_comments\\_8-8-11\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/12-arb_lcfs__comments_8-8-11_final.pdf)

Original File Name: ARB LCFS Comments 8-8-11 FINAL.pdf

Date and Time Comment Was Submitted: 2011-08-10 13:50:34

No Duplicates.

**Comment 13 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Jessica

Last Name: Wiechman

Email Address: jwiechman@rmpgllc.com

Affiliation:

Subject: LCFS Comments First Workshop

Comment:

Attached are RPMG, Inc comments received by email on 8/8/2011.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/13-ca\\_lcfs\\_comments\\_first\\_workshop\\_rpmg.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/13-ca_lcfs_comments_first_workshop_rpmg.pdf)

Original File Name: CA LCFS Comments First Workshop\_RPMG.pdf

Date and Time Comment Was Submitted: 2011-08-16 11:35:28

No Duplicates.

**Comment 14 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation:

Subject: ARB LCFS Comments

Comment:

Attached are CalETC comments submitted on 8/8/2011. Replace 8/5 submittal.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/14-arb\\_lcfs\\_\\_comments\\_8-8-11\\_final\\_caletc.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/14-arb_lcfs__comments_8-8-11_final_caletc.pdf)

Original File Name: ARB LCFS Comments 8-8-11 FINAL\_CalETC.pdf

Date and Time Comment Was Submitted: 2011-08-16 11:42:05

No Duplicates.

**Comment 15 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Alana

Last Name: Chavez-Langdon

Email Address: AChavez@ecotality.com

Affiliation:

Subject: EV Service and Equipment Provider (EVSEP) Coalition Position - Proposed Amendments to LCFS

Comment:

Attached are EVSEP comments sent by email.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/15-evsep\\_coalition\\_carb\\_lcfs\\_letter7\\_22.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/15-evsep_coalition_carb_lcfs_letter7_22.pdf)

Original File Name: EVSEP\_Coalition CARB LCFS Letter7\_22.pdf

Date and Time Comment Was Submitted: 2011-08-16 11:55:35

No Duplicates.

**Comment 16 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 1st Workshop.**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: NRDC comments on July 22, 2011 LCFS Regulatory Workshop

Comment:

Please find our comments on the LCFS regulatory changes attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/17-nrdc\\_comments\\_july\\_22\\_lcfs\\_regulatory\\_workshop.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/17-nrdc_comments_july_22_lcfs_regulatory_workshop.pdf)

Original File Name: NRDC comments\_July 22 LCFS Regulatory Workshop.pdf

Date and Time Comment Was Submitted: 2011-09-27 10:47:36

No Duplicates.

**Comment 17 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Bob

Last Name: Whiteman

Email Address: BobWhiteman@PoetEP.com

Affiliation: Poet Ethanol Products

Subject: 2nd Workshop Regulatory Amendments Commentary

Comment:

Please see attached comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/18-carb\\_lcfs\\_regulatory\\_amendments\\_commentary\\_9-27-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/18-carb_lcfs_regulatory_amendments_commentary_9-27-11.pdf)

Original File Name: CARB LCFS Regulatory Amendments Commentary 9-27-11.pdf

Date and Time Comment Was Submitted: 2011-09-27 13:36:26

No Duplicates.

**Comment 18 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Simon

Last Name: Mui

Email Address: [smui@nrdc.org](mailto:smui@nrdc.org)

Affiliation:

Subject: Submissions on the High Carbon Intensity Crude Oil Provision

Comment:

On behalf of both NRDC and CEERT, please find attached a letter providing ARB feedback on the High Carbon Intensity Crude Oil Provision options.

Thank you,

Simon Mui (NRDC)

John Shears (CEERT)

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/19-nrdc\\_ceert\\_comments\\_hcico\\_approaches\\_09\\_27\\_11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/19-nrdc_ceert_comments_hcico_approaches_09_27_11.pdf)

Original File Name: NRDC\_CEERT\_Comments\_HCICO\_approaches\_09 27 11.pdf

Date and Time Comment Was Submitted: 2011-09-27 14:25:31

No Duplicates.

## **Comment 19 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Cal

Last Name: Hodge

Email Address: A2ndOpinionInc@aol.com

Affiliation:

Subject: 65486 of Proposed LCFS Ammendments

Comment:

A2O Comments on LCFS Regulatory Amendments filed September 28, 2011 using the comment submittal form located at:

<http://www.arb.ca.gov/fuels/lcfs/regamend/regamend.htm>

with Courtesy Email copies to:

asideco@arb.ca.gov, fvergara@arb.ca.gov, hchowdhua@arb.ca.gov, jcoutis@arb.ca.gov, jduffy@arb.ca.gov, wingram@arb.ca.gov, rcorey@arb.ca.gov, mwaugh@arb.ca.gov

Thank you for the opportunity to comment on the proposed amendments to the Low Carbon Fuel Standard (LCFS). The comment period is very limited. Therefore, I will focus on the changes to §95486 that have the greatest potential to make it prohibitive or even create a unintended trade barrier for biofuel producers that wish to supply California with cleaner burning low carbon fuels.

A 2nd Opinion, Inc.'s client, Neste Oil Corporation (Neste) is the world's leading producer of renewable diesel fuel. California is a key potential market for this cleaner burning, NOx reducing, low carbon renewable diesel fuel. Therefore, we all (A2O, California and Neste) have a vested interest in making sure that changes to the LCFS regulations do not make it prohibitive to improve California air quality while lowering carbon emissions. The proposed changes to §95486 may create unintended trade barriers that make it more difficult to satisfy California's desires for cleaner air and lower carbon emissions and reduce the authority of the Executive Officer. Because things that were legal under the existing regulations may not satisfy the proposed changes, there may be a conflict with Clause 1 of Section 10, Article 1 of the US Constitution.

The most problematic revision occurs in §95486(a)(2). The phrase, "all important respects" is not defined. We will explain why that is a problem and suggest a revision that will not restrict low carbon fuels producers' ability to supply California any more than the current regulations. I will now recap the existing regulations and how the proposed regulations may help or hurt.

The existing regulation §95486(b)(2)(B) requires the regulated party to use the Carbon Intensity value in the Lookup Table that most closely corresponds to the production process used subject to approval by the Executive Officer. §95486(a)(3) of the existing regulation requires that if the Executive officer disagrees with the regulated party's choice, the Executive Officer "shall choose a carbon intensity value, in the Carbon Intensity Lookup Tables for the fuel or blendstock, which the Executive Officer determines is

the one that most closely corresponds to the pathway for that fuel or blendstock...." Under the existing regulation, the Executive Officer must choose a value and does not appear to have the option to determine that Method 1 does not apply.

§95486(a)(2) of the existing regulation requires a regulated party for any other fuel or blendstock to use Method 1 unless the regulated party is approved for using either Method 2A or Method 2B, as provided in section 95486(c) or (d). In §95486(c) and (d) the regulated party proposes and demonstrates pathways subject to the Executive Officer's approval. If the regulated party does not propose a 2A or 2B pathway, the Executive Officer cannot approve the use of the 2A or 2B pathway. If he does not propose a 2A or 2B pathway the regulated party must use Method 1.

The proposed new language for §95486(b)(2)(B) that requires a regulated party to determine if the Carbon Intensity Lookup Table contains pathways that correspond to the regulated party's fuel pathways and then use the CIs from the table subject to the Executive officer's approval might be a good improvement if the proposed §95486(a)(2) language is revised. It provides a way to deal with feedstocks and processes that are not in the Lookup Tables.

The proposed language in §95486(a)(3) that requires the Executive Officer to rule out the use of Method 1 also provides a way to deal with feedstocks and processes that are not in the Lookup Tables. It does however, undermine the Executive Officer's authority to choose the Carbon Intensity that most closely corresponds to the pathway for the fuel or blendstock when the biomass feedstock and conversion process are in the Lookup Tables and save staff man-hours. Let me illustrate by use of a couple of examples.

It is easy to determine that there is no catfish to ethanol pathway in the Lookup Tables. Having the flexibility to "rule out the use of Method 1" rather than having to "choose a carbon intensity value, in the Carbon Intensity Lookup Tables" expands the Executive Officer's authority to deal with feedstocks and processes that are not in the Lookup Tables.

The existing pathways include renewable diesel from soy beans. The regulated party who converts soybeans to renewable diesel is going to select the same carbon intensities whether he "must use" under the current regulation or "must determine...shall use..." under the revised §95486(b)(2)(B). Without the escape hatch that allows the Executive Officer to "rule out the use of Method 1" the Executive Officer has the authority to observe that most of the carbon intensity of a renewable diesel is determined by the renewable biomass selection and the conversion process used to transform it to a usable motor fuel. He has the authority to observe that because the same work has to be done to produce the biomass regional differences will probably be small and because similar transformations must occur regardless of the sources of the soy oil the energy and carbon inputs required to pretreat and transform it to motor fuel will be of similar magnitude. Without the escape hatch the Executive Officer has the authority and actually the obligation to choose a carbon intensity from the lookup table that corresponds to the feedstock and process. Without the obligation competitors could file lawsuits arguing that the Executive Officer did not have the authority to choose a carbon intensity and that the Executive Officer exceeded the Executive Officer's authority. The proposed change in §95486(a)(3) should be revised as follows:

"If Carbon Intensity Lookup Tables do not contain a fuel pathway with a feedstock and conversion process that closely corresponds with the regulated party's fuel pathway, as specified in 95486 (a)(2), the Executive Officer shall rule out the use of Method 1 for determining the regulated party's fuel carbon intensity."

This change would provide the authority to deal with feedstocks and processes not contained in the Lookup Tables while preserving the Executive Officers authority to move the LCFS forward and keep staff resources focused on substantial Type 2A pathways or Type 2B pathways.

The main problem with the proposed §95486 language occurs in §95486(a)(2) with the sentence:

"In order to closely correspond with a Carbon Intensity Lookup Table pathway, a regulated party's pathway must be consistent in all important respects with the technical supporting document behind that Carbon Intensity Lookup Table pathway."

The key cause of the problem is "all important respects" is not defined. If it includes only feedstock selected and conversion process, one can conclude that the practical application of the regulation has not changed and that the language changes are for clarification. On the other hand, if "all important respects" includes all the line items in the typical "Table A. Summary of Energy Use and GHG Emissions for the ..." that occurs in many pathways or in an even worse case , all the entries in the CA GREET model, the revised regulation limits renewable fuel supplies to only those fuels that precisely match Lookup Table fuels. Until a very large number of Type 2A and 2B pathways are completed and approved, this could create a supply shortfall that could significantly increase LCFS compliance and consumer fuel costs, create an unintended trade barrier or make something that was legal under the existing regulation illegal. To avoid excessive staff work load and these potential problems the troublesome sentence should be changed to:

"In order to closely correspond with a Carbon Intensity Lookup Table pathway, the feedstock and conversion process used in the regulated party's pathway should be similar to the feedstock and conversion process used in the technical supporting document behind that Carbon Intensity Lookup Table pathway."

This concludes our comments on §95486. We are examining the other changes and considering missing elements and will file comments as time permits.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/21-a2o\\_comments\\_on\\_lcfs\\_regulatory\\_amendments\\_filed\\_september\\_28.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/21-a2o_comments_on_lcfs_regulatory_amendments_filed_september_28.pdf)

Original File Name: A2O Comments on LCFS Regulatory Amendments Filed September 28.pdf

Date and Time Comment Was Submitted: 2011-09-28 08:05:47

No Duplicates.

**Comment 20 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: John  
Last Name: Braeutigam  
Email Address: john.braeutigam@valero.com  
Affiliation: Valero

Subject: Proposed LCFS Regulation Changes

Comment:

See attached letter.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/22-valero\\_lcfs\\_regulation\\_changes\\_and\\_september\\_14\\_workshop\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/22-valero_lcfs_regulation_changes_and_september_14_workshop_comments.pdf)

Original File Name: Valero LCFS Regulation Changes and September 14 Workshop Comments.pdf

Date and Time Comment Was Submitted: 2011-09-28 11:32:00

No Duplicates.

**Comment 21 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Ralph

Last Name: Moran

Email Address: Ralph.Moran@bp.com

Affiliation:

Subject: BP Comments on LCFS Reg Amendments

Comment:

Attached please find our comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/23-bp\\_comments\\_to\\_carb\\_on\\_lcfs\\_elec\\_reg\\_party\\_9\\_11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/23-bp_comments_to_carb_on_lcfs_elec_reg_party_9_11.pdf)

Original File Name: BP comments to CARB on LCFS Elec Reg Party 9 11.pdf

Date and Time Comment Was Submitted: 2011-09-28 13:38:25

No Duplicates.

**Comment 22 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Jessica

Last Name: Wiechman, RPMG, Inc.

Email Address: jwiechman@rmpgllc.com

Affiliation:

Subject: Comments of Renewable Products Marketing Group (RPMG) in regard to LCFS Proposed Regulation

Comment:

Comments of Renewable Products Marketing Group (RPMG) in regard to LCFS Proposed Regulation Amendments

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/25-comments\\_of\\_renewable\\_products\\_marketing\\_group\\_rpmg\\_in REGARD\\_to\\_lcfs\\_proposed regulation\\_amendments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/25-comments_of_renewable_products_marketing_group_rpmg_in REGARD_to_lcfs_proposed regulation_amendments.pdf)

Original File Name: Comments of Renewable Products Marketing Group (RPMG) in regard to LCFS Proposed Regulation Amendments.pdf

Date and Time Comment Was Submitted: 2011-09-28 15:18:00

No Duplicates.

**Comment 23 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Geoff

Last Name: Cooper

Email Address: [gcooper@ethanolrfa.org](mailto:gcooper@ethanolrfa.org)

Affiliation: Renewable Fuels Association

Subject: RFA Comments Re: Second Regulatory Amendments Workshop (Sep. 14)

Comment:

Please find attached RFA's comments in response to the second regulatory amendments workshop.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/26-rfa\\_comments\\_2nd\\_arb\\_lcfs\\_reg\\_amdts\\_wkshp\\_092811.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/26-rfa_comments_2nd_arb_lcfs_reg_amdts_wkshp_092811.pdf)

Original File Name: RFA comments\_2nd ARB LCFS reg amdts wkshp\_092811.pdf

Date and Time Comment Was Submitted: 2011-09-28 16:21:37

No Duplicates.

**Comment 24 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Cal

Last Name: Hodge

Email Address: A2ndOpinionInc@aol.com

Affiliation: A 2nd Opinion, Inc.

Subject: LCFS LUC Workgroup Sep 14 2011 comments

Comment:

See attachment for details. But based upon the data presented I look forward to lower ILUC contribution to carbon intensities.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/27-a2o\\_comments\\_re\\_lcfs\\_luc\\_sept142011\\_workshop.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/27-a2o_comments_re_lcfs_luc_sept142011_workshop.pdf)

Original File Name: A2O comments re LCFS LUC Sept142011 Workshop.pdf

Date and Time Comment Was Submitted: 2011-09-29 07:52:12

No Duplicates.

**Comment 25 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Gina

Last Name: Grey

Email Address: [ggrey@wspa.org](mailto:ggrey@wspa.org)

Affiliation: Western States Petroleum Association

Subject: WSPA Comments on LCFS Regulatory Amendments - September 14 Workshop

Comment:

Attached are WSPA's comments on the issues discussed during the 9/14 proposed LCFS regulatory amendments workshop.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/28-lcfs\\_reg\\_amendments\\_wspa\\_comments\\_911.rev2.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/28-lcfs_reg_amendments_wspa_comments_911.rev2.pdf)

Original File Name: LCFS Reg amendments WSPA comments 911.rev2.pdf

Date and Time Comment Was Submitted: 2011-09-29 08:09:56

No Duplicates.

**Comment 26 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Debrán

Last Name: Jones Reed

Email Address: DXJones@semprautilities.com

Affiliation:

Subject: LCFS Regulation Amendments

Comment:

Attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/29-draft\\_lcfs\\_sept\\_28.seu\\_commts.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/29-draft_lcfs_sept_28.seu_commts.pdf)

Original File Name: DRAFT LCFS Sept 28.SEu Commts.pdf

Date and Time Comment Was Submitted: 2011-10-03 08:55:54

No Duplicates.

**Comment 27 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Jesper

Last Name: Kløverpris

Email Address: [jklp@novozyymes.com](mailto:jklp@novozyymes.com)

Affiliation:

Subject: Public Comments for the Low Carbon Fuel Standard Proposed Rulemaking

Comment:

Please, see attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/30-letter\\_to\\_carb\\_from\\_novozyemes\\_-\\_sept\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/30-letter_to_carb_from_novozyymes_-_sept_2011.pdf)

Original File Name: Letter to CARB from Novozyymes - Sept 2011.pdf

Date and Time Comment Was Submitted: 2011-10-03 23:21:06

No Duplicates.

**Comment 28 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Vance

Last Name: Klager

Email Address: Vance.Klager@FHR.com

Affiliation:

Subject: Flint Hills Resources' Informal Comments

Comment:

Attached is a scanned version of Flint Hills Resources' informal comments on CARB's proposed LCFS amendments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/31-fhr\\_informal\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/31-fhr_informal_comments.pdf)

Original File Name: FHR Informal Comments.PDF

Date and Time Comment Was Submitted: 2011-10-04 13:10:57

No Duplicates.

**Comment 29 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 30 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Stephanie

Last Name: Batchelor

Email Address: [sbatchelor@bio.org](mailto:sbatchelor@bio.org)

Affiliation:

Subject: BIO LCFS Comments - potential ILUC/carbon intensity changes

Comment:

BIO and its member companies wish to provide brief, high level comments in response to the model structure and parameter changes; specifically related to GTAP work on indirect land use change (ILUC), and other indirect effects from biofuel production. We understand CARB will be incorporating this data, and subsequent modeling work on indirect effects, to update the overall carbon intensity (CI) calculations for at least four biofuel pathways in California's Low Carbon Fuel Standard (LCFS).

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/33-bio\\_comments\\_10-04-2011.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/33-bio_comments_10-04-2011.zip)

Original File Name: BIO comments 10-04-2011.zip

Date and Time Comment Was Submitted: 2011-10-04 17:04:45

No Duplicates.

**Comment 31 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Chris

Last Name: Malins

Email Address: chris@theicct.org

Affiliation: ICCT

Subject: iLUC modelling revisions

Comment:

The ICCT's comments are attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/34-icct\\_comments\\_on\\_revised\\_iluc\\_modelling\\_oct\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/34-icct_comments_on_revised_iluc_modelling_oct_2011.pdf)

Original File Name: ICCT\_comments on revised iLUC modelling Oct 2011.pdf

Date and Time Comment Was Submitted: 2011-10-05 07:30:56

No Duplicates.

**Comment 32 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Jamey

Last Name: Cline

Email Address: [cline@ncga.com](mailto:cline@ncga.com)

Affiliation:

Subject: ILUC Comments from NCGA

Comment:

ILUC Comments from NCGA

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/35-ncga\\_comments-oct-11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/35-ncga_comments-oct-11.pdf)

Original File Name: NCGA Comments-Oct-11.pdf

Date and Time Comment Was Submitted: 2011-10-05 12:23:57

No Duplicates.

**Comment 33 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Chris

Last Name: Bliley

Email Address: [cbliley@growthenergy.org](mailto:cbliley@growthenergy.org)

Affiliation:

Subject: Growth Energy Comments

Comment:

Please see the attached comments from Growth Energy CEO, Tom Buis.  
Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/36-gecarbcomments10052011.pdf>

Original File Name: GECARBcomments10052011.pdf

Date and Time Comment Was Submitted: 2011-10-05 13:10:02

No Duplicates.

**Comment 34 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Geoff

Last Name: Cooper

Email Address: [gcooper@ethanolrfa.org](mailto:gcooper@ethanolrfa.org)

Affiliation: Renewable Fuels Association

Subject: RFA Comments re: Change to ILUC Analysis (9/14 workshop)

Comment:

Comments attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/37-rfa\\_comments\\_on\\_carb\\_iluc\\_changes\\_sep14.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/37-rfa_comments_on_carb_iluc_changes_sep14.pdf)

Original File Name: RFA\_comments on CARB ILUC changes\_Sep14.pdf

Date and Time Comment Was Submitted: 2011-10-05 13:46:59

No Duplicates.

**Comment 35 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Shelby

Last Name: Neal

Email Address: [sneal@biodiesel.org](mailto:sneal@biodiesel.org)

Affiliation:

Subject: Comments on Soy Biodiesel ILUC

Comment:

Attached, please find public comments regarding the recently released work to estimate ILUC for soy biodiesel.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/38-nbb\\_comments\\_on\\_soy\\_iluc\\_10-5-11\\_2\\_.zip](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/38-nbb_comments_on_soy_iluc_10-5-11_2_.zip)

Original File Name: NBB Comments on Soy ILUC 10-5-11 (2).zip

Date and Time Comment Was Submitted: 2011-10-05 14:50:05

No Duplicates.

**Comment 36 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on LCFS Regulatory Amendments Workshop and Proposed Regulation Order

Comment:

Please see SCE's attached comments on the LCFS Regulatory Amendments Workshop and the Proposed Regulation Order.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/39-sce\\_comments\\_to\\_carb\\_on\\_lcfs\\_regulation\\_amendments\\_october\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/39-sce_comments_to_carb_on_lcfs_regulation_amendments_october_2011.pdf)

Original File Name: SCE Comments to CARB on LCFS Regulation Amendments October 2011.pdf

Date and Time Comment Was Submitted: 2011-10-05 16:20:40

No Duplicates.

**Comment 37 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Max

Last Name: Baumhefner

Email Address: [mbaumhefner@nrdc.org](mailto:mbaumhefner@nrdc.org)

Affiliation: Natural Resources Defense Council

Subject: Comments on the September 14, 2011 Low Carbon Fuel Standard Workshop

Comment:

See attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/40-nrdc\\_comments\\_september\\_14\\_lcfs\\_regulatory\\_workshop.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/40-nrdc_comments_september_14_lcfs_regulatory_workshop.pdf)

Original File Name: NRDC Comments\_September 14 LCFS Regulatory Workshop.pdf

Date and Time Comment Was Submitted: 2011-10-05 16:26:21

No Duplicates.

**Comment 38 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Lily

Last Name: Mitchell

Email Address: lmitchell@hanmor.com

Affiliation: SCPPA

Subject: SCPPA comments on 9/14/11 revisions to LCFS regulation

Comment:

Please find attached the comments of the Southern California Public Power Authority on the proposed changes to the Low Carbon Fuel Standard regulation discussed at the workshop on 9/14/11.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/41-300226001lmm10051101\\_scppa\\_comment\\_on\\_lcfs\\_regs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/41-300226001lmm10051101_scppa_comment_on_lcfs_regs.pdf)

Original File Name: 300226001lmm10051101 SCPPA comment on LCFS regs.pdf

Date and Time Comment Was Submitted: 2011-10-05 16:41:31

No Duplicates.

**Comment 39 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Roger

Last Name: Conway

Email Address: rconway703@gmail.com

Affiliation: Rosslyn Advisors

Subject: Comments to ARB Regarding Yield-Price Elasticities

Comment:

Attached are comments on the Berry paper evaluating price-yield elasticities for the GTAP model.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/42-note\\_on\\_price-yield\\_elasticity\\_docx10\\_4\\_2011.docx](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/42-note_on_price-yield_elasticity_docx10_4_2011.docx)

Original File Name: Note on price-yield elasticity docx10 4 2011.docx

Date and Time Comment Was Submitted: 2011-10-05 18:42:49

No Duplicates.

**Comment 40 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Jamie

Last Name: Knapp

Email Address: [jamie@jknappcommunications.com](mailto:jamie@jknappcommunications.com)

Affiliation:

Subject: NGO Comments on ILUC

Comment:

Comments attached from environmental advocates on ILUC re: Sept. 14 workshop.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/43-ngo-carb\\_iluc\\_letter\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/43-ngo-carb_iluc_letter_final.pdf)

Original File Name: NGO-CARB\_ILUC\_letter\_final.pdf

Date and Time Comment Was Submitted: 2011-10-05 18:49:12

No Duplicates.

**Comment 41 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Timothy

Last Name: Searchinger

Email Address: tsearchi@princeton.edu

Affiliation: Princeton University

Subject: Comments on GTAP Land Function

Comment:

Enclosed please find some comments on the GTAP land expansion function.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/44-searchinger\\_comments\\_on\\_gtap\\_land\\_function\\_\\_october\\_25\\_\\_2011\\_.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/44-searchinger_comments_on_gtap_land_function__october_25__2011_.pdf)

Original File Name: Searchinger Comments on GTAP Land Function (October 25, 2011).pdf

Date and Time Comment Was Submitted: 2011-10-05 19:05:13

No Duplicates.

**Comment 42 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Leticia

Last Name: Phillips

Email Address: leticia@unica.com.br

Affiliation: UNICA- BRazilian Sugarcane Industry Assc

Subject: Comments on September 14, 2011 - LCFS Regulatory Amendments Workshop

Comment:

Please see attached the Brazilian Sugarcane Industry Association's (UNICA) comments on the September 14 LCFS Regulatory Amendments Workshop.

Thank you,

Leticia Phillips

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/45-unica\\_comments\\_to\\_carb\\_20111005.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/45-unica_comments_to_carb_20111005.pdf)

Original File Name: UNICA comments to CARB 20111005.pdf

Date and Time Comment Was Submitted: 2011-10-05 20:45:20

No Duplicates.

**Comment 43 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Eileen

Last Name: Tutt

Email Address: Eileen@caletc.com

Affiliation:

Subject: CalETC Comments on Sept LCFS Workshop

Comment:

Attachment.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/46-arb\\_lcfs\\_\\_comments\\_sept\\_workshop\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/46-arb_lcfs__comments_sept_workshop_final.pdf)

Original File Name: ARB LCFS Comments Sept Workshop final.pdf

Date and Time Comment Was Submitted: 2011-10-06 08:35:39

No Duplicates.

**Comment 44 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 2nd Workshop.**

First Name: Simon

Last Name: Mui

Email Address: [smui@nrdc.org](mailto:smui@nrdc.org)

Affiliation:

Subject: 29 Organizations Support Inclusion of HCICO

Comment:

Please find attached a letter from 29 nonprofit, health-based, religious, and businesses supporting the inclusion of a high-carbon intensity crude oil provision.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/47-final\\_letter\\_to\\_mary\\_nichols\\_from\\_29\\_organizations\\_lcfs\\_high-carbon\\_fuels\\_september\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/47-final_letter_to_mary_nichols_from_29_organizations_lcfs_high-carbon_fuels_september_2011.pdf)

Original File Name: Final\_Letter to Mary Nichols from 29 Organizations\_LCFS High-Carbon Fuels\_September 2011.pdf

Date and Time Comment Was Submitted: 2011-10-06 14:44:07

No Duplicates.

**Comment 45 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Meg

Last Name: Meal

Email Address: mmeal@swwater.org

Affiliation: SFPUC

Subject: Resubmittion of Comments Regarding Sept. 14th Workshop

Comment:

Please see the attachment for our comments.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/48-sfpuc\\_lcfs\\_workshop\\_9-14\\_comments.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/48-sfpuc_lcfs_workshop_9-14_comments.pdf)

Original File Name: SFPUC\_LCFS\_Workshop\_9-14\_Comments.pdf

Date and Time Comment Was Submitted: 2011-10-17 16:32:07

No Duplicates.

**Comment 46 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Cathy  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation: WSPA

Subject: WSPA Comments on Oct. 14 LCFS Reg Amendment Workshop  
Comment:

Attached is WSPA's comment letter on the October 14th LCFS regulatory amendment workshop.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/49-lcfs\\_reg\\_amendments\\_wspa\\_comments.1011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/49-lcfs_reg_amendments_wspa_comments.1011.pdf)

Original File Name: LCFS Reg amendments WSPA comments.1011.pdf

Date and Time Comment Was Submitted: 2011-10-20 16:00:52

No Duplicates.

**Comment 47 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Cal  
Last Name: Hodge  
Email Address: A2ndOpinionInc@aol.com  
Affiliation: A 2nd Opinion, Inc.

Subject: Proposed LCFS Amendments

Comment:

Thank you for the opportunity to comment on the proposed changes to the Low carbon Fuel Standard. These comments pertain to the draft of the proposed regulation that was published for use in the October 14, 2011 Workshop. The proposed changes will make satisfying the LCFS more difficult.

The attachment contains a table that compares §95486 of the existing regulation with the proposed §95486. I believe the table shows that the changes are significant and that they make it more difficult to supply California with low carbon blendstocks.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/51-a2o\\_comments\\_on\\_111411\\_draft\\_proposed\\_lcfs\\_regs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/51-a2o_comments_on_111411_draft_proposed_lcfs_regs.pdf)

Original File Name: A2O Comments on 111411 draft proposed LCFS regs.pdf

Date and Time Comment Was Submitted: 2011-10-21 14:49:41

No Duplicates.

**Comment 48 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Nancy

Last Name: Allred

Email Address: nancy.allred@sce.com

Affiliation: Southern California Edison Company

Subject: SCE Comments on Third LCFS Regulatory Workshop

Comment:

Please see attached for Southern California Edison Company's comments on the Third LCFS Regulatory Workshop.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/52-sce\\_comments\\_to\\_carb\\_on\\_third\\_lcfs\\_regulatory\\_workshop\\_oct\\_21\\_2011.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/52-sce_comments_to_carb_on_third_lcfs_regulatory_workshop_oct_21_2011.pdf)

Original File Name: SCE Comments to CARB on Third LCFS Regulatory Workshop Oct 21 2011.pdf

Date and Time Comment Was Submitted: 2011-10-21 16:07:30

No Duplicates.

**Comment 49 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Cassie

Last Name: Doyle

Email Address: sfran-gr@international.gc.ca

Affiliation:

Subject: Government of Canada Comments on LCFS

Comment:

To Whom It May Concern: Attached please find the Government of Canada comments on LCFS.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/53-government\\_of\\_canada\\_comments\\_on\\_lcfs.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/53-government_of_canada_comments_on_lcfs.pdf)

Original File Name: Government of Canada Comments on LCFS.pdf

Date and Time Comment Was Submitted: 2011-10-21 16:35:30

No Duplicates.

**Comment 50 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Max

Last Name: Baumhefner

Email Address: mbaumhefner@nrdc.org

Affiliation: NRDC

Subject: Comments on the October 14, 2011 Low Carbon Fuel Standard Workshop

Comment:

see attached

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/54-nrdc\\_comments\\_on\\_10-14-11\\_lcfs\\_workshop.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/54-nrdc_comments_on_10-14-11_lcfs_workshop.pdf)

Original File Name: NRDC Comments on 10-14-11 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2011-10-21 16:47:50

No Duplicates.

**Comment 51 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Max Baumhefner

Last Name: Baumhefner

Email Address: mbaumhefner.nrdc@gmail.com

Affiliation: Natural Resources Defense Council

Subject: NRDC Comments on Draft Electricity Language

Comment:

Attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/55-nrdc\\_comments\\_on\\_10-14-11\\_lcfs\\_workshop.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/55-nrdc_comments_on_10-14-11_lcfs_workshop.pdf)

Original File Name: NRDC Comments on 10-14-11 LCFS Workshop.pdf

Date and Time Comment Was Submitted: 2011-10-24 11:45:41

No Duplicates.

**Comment 52 for Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) - 3rd Workshop.**

First Name: Genevieve  
Last Name: Dufau-McCarthy  
Email Address: GFD3@pge.com  
Affiliation: Pacific Gas and Electric

Subject: Comments PG&E LCFS Regulatory Language

Comment:

Attached.

Attachment: [https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/56-pg\\_e\\_response\\_10.21.11.pdf](https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach-old/lcfs-regamend-ws/56-pg_e_response_10.21.11.pdf)

Original File Name: PG&E Response\_10.21.11.pdf

Date and Time Comment Was Submitted: 2011-10-24 11:56:03

No Duplicates.

**There are no comments posted to Comments on the LCFS Proposed Rulemaking (lcfs-regamend-ws) that were presented during the Workshop at this time.**