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Rajinder Sahota  
Division Chief, Industrial Strategies Division  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Ms. Sahota:

I am writing to you to express support for the Novel Technology Investment Credit (NTIC) program that was presented by Virent and Marathon in the LCFS Public Workshop on Oct. 15, and Captis Aire encouragement that CARB move the NTIC program into the next rule making process for incorporation into the LCFS.

Captis Aire provides an energy efficient, renewable energy emissions control technology that also reduces greenhouse gas emissions! This technology captures organics from industrial process air exhaust streams and provides these organics for use as renewable biofuels. For example, terpenes, a potential biofuel, are captured when controlling emissions from wood drying processes. The technology has been under development since 2015 and has been very successfully demonstrated twice at the pilot scale. Support to scale up this valuable technology to its full commercial potential, will speed biofuel introduction into US markets.

Captis Aire supports the NTIC program because we believe it is the correct approach to advance the growing need for low carbon fuels in California. It will help companies, like ours, bring new technologies for low carbon fuels to commercial scale. We believe the program is correctly structured to limit the LCFS programs risk in that investors will need to take the upfront risks to demonstrate the new technology is commercially and operationally viable. Additionally, administrative controls to limit the number of credits awarded to between five and seven and a half percent of deficits will help to ensure existing investments are not placed at a disadvantage and can be implemented under the existing CARB administrative infrastructure with no cash outlays by the State of California. We believe that the NTIC program will bring significant additional investments into new low carbon fuels technologies, resulting in significant increases in production of low carbon fuels.

For all these reasons, Captis Aire encourages you to move the NTIC program forward in the CARB rule making process.

Best Regards,

Kim Tutin  
Captis Aire Founder and CEO