

August 8, 2022

Low Carbon Fuels Standard Program  
California Air Resources Board  
Sacramento, CA 95814

**Re: Comments on LCFS Program Staff Presentation on July 7, 2022**

Dear Policymakers:

California's Low-Carbon Fuel Standard (LCFS) program has made major progress in lowering the greenhouse gas emissions from transport without causing material detriment to the economy. It is a model emulated by other governments.

Our company is focused on the renewable electrification of California and other US western states. We believe this is possible to accomplish quickly with coordination between market and policy actors.

We write to urge CARB to allow book-and-claim renewables to make the best use of energy storage. We need massive amounts of low-cost energy storage for all the major categories of LCFS fuels, including electric vehicle charging, hydrogen production and biorefineries. Book-and-claim accounting is necessary for storage to play its role in providing time-coincident renewable EV charging and other flexibility and dispatchability in the state's energy infrastructure.

Today, unfortunately, LCFS program regulations require that renewables must be *on site* to be recognized as low-carbon energy inputs, for example, to the hydrogen or biorefinery manufacturing process. While this is a practical option for some sites in wide-open spaces, it is an unhelpful limitation for low-carbon fuel facilities located in or near major population centers such as Los Angeles, San Diego and San Jose. For that reason, wind and solar power at the scale required to electrify a low-carbon fuel facilities in urban or suburban areas must be located at some distance away from the plant.

We therefore ask CARB to allow California market actors to use **book-and-claim accounting to recognize time-coincident renewables**.

What would happen if CARB allowed low-carbon fuel-producing facilities to use book-and-claim low-CI time-coincident electricity and energy storage as part of their pathways? EV charging facilities at home or a workplace, for example, for which the main energy input is grid power, would immediately eliminate the greenhouse gas emissions from burning natural gas to produce power on the grid with that portion made

with renewable power. The EVs could, for example, run on 100% solar power, significantly lowering the CI of their fuel.

For the LCFS program, it's not difficult to see the result. In addition to providing more options for producing very-low-carbon fuels, CARB could see the CI of many fuels drop while leveraging the investments that the state's vehicle owners have made in their vehicles.

Sincerely,  
*Jon Guice*

Jon Guice, PhD  
Chief Executive