



August 8, 2022

Rajinder Sahota
Deputy Executive Officer

California Air Resources Board
Low Carbon Fuel Standard Program
1001 I St.
Sacramento, CA 95814

**Comments in Response to the July 7, 2022 LCFS Workshop to
Discuss Potential Changes to the LCFS Regulation**

Dear Ms. Sahota,

Iogen Corporation (“Iogen”) would like to thank California’s Air Resource Board (CARB) for the opportunity to comment on the July 7 workshop on discussing potential changes to the current Low Carbon Fuel Standard (LCFS) regulation.

Iogen is one of the world’s leading firms in the field of cellulosic biofuels. We have been in the cellulosic biofuel business for over 30 years, invested roughly \$500 million in research, development and demonstration and have more than 300 issued and pending patents. We have implemented our cellulosic ethanol production technology in Brazil at Raizen Energia’s 10 million gallon per year Costa Pinto Facility, which is now producing cellulosic ethanol from bagasse. We are also very active in the deployment of biogas-based cellulosic biofuels in the United States. We are responsible 150,000 tons per year of avoided emissions under the LCFS (credits). Together with our strategic partners, our focus going forward is expanding the availability and use of decarbonized hydrogen in transportation applications.

Iogen applauds CARB for initiating this process to ensure the program continues to excel and to provide robust opportunities for public feedback. CARB has demonstrated it has established an unmatched program, attaining a 9.36% reduction in transportation fuel CI, as compared to a target of 8.75%, by the end of 2021. The LCFS program has been highly effective and the sustained domestic and global interest in the framework will continue to drive us toward an equitable and affordable energy transition.

The four scenarios from CARB’s Draft 2022 Scoping Plan modeling work prove that aggressive action is required for the transportation sector in order to meet the state’s climate and energy goals. Strong LCFS targets for the next 8-10 years will be a critical market signal for investors and enable the state to move faster toward sector-wide GHG emission reductions. The declines

in LCFS credit prices this year indicate that demand for low-carbon fuels is currently outpaced by supply. More stringent carbon intensity targets will help to stabilize prices and boost certainty for investors looking to support fuel decarbonization projects.

Iogen suggests and encourages new LCFS targets through the year 2035, in order to give a 10-year outlook on the program. Targets through 2045 might be more effectively established in another 10 years, when those targets can be determined based on the best available technology at that time and therefore a better estimate of what is feasible.

Thank you for the consideration of our comments. Should CARB have any questions or require any additional information, we welcome further discussion and review. We look forward to continuing to work with CARB staff on this program.

Sincerely,

Brian Foody, CEO
Iogen Corporation