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**Date:** June 19, 2015 at 1:08:53 PM PDT  
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**Subject:** CA GREET 2.0 Comments - UNICA

Dear Mr. Pham,

My name is Leticia Phillips and I serve as the North American Representative for the Brazilian Sugarcane Industry Association (UNICA).

I wanted to write you with a few comments regarding the CA GREET 2.0 documents that were posted on CARB's webpage on June 4, 2015.

While we appreciate staff's effort to update the electricity resource mix for Brazil, based on the most up to date data, we are still disappointed that CARB is proposing using energy mix all together. We believe Brazilian sugarcane ethanol pathway is only accurately represented if using the marginal electricity resource mix.

On page 2 of the *CA GREET 2.0 Supplemental Documents and Table Changes*, CARB states that "Staff determined that the simplest, most equitable and defensible method is to apply the regional average across all pathways." We believe that the simplest method is to use the marginal values accepted by IPCC – which I believe was already provided to CARB by Agrolcone in Brazil. We also believe that the adoption of energy mix for Brazil unfairly penalizes the country because it benefits pathways dependant on energy in detriment of pathways that generate energy, like in our case. And finally, since the original GREET already has a marginal value calculated, it is hard to defend using a new number that worsens the model.

Another point that I do not understand and would like clarification is how each mill will present its electricity credit; kWh per gallon of ethanol. The default value do not exist anymore?

We have always admired and supported the work of CARB staff on the LCFS, we believe it is an incredible program that can curb GHG emissions and deliver better air quality for the citizens of California. We disagree from CARB's move to use electricity resource mix in the CA GREET 2.0 for Brazil. We know you are working on a tight deadline but we urge you to review this decision.

I look forward to continue to collaborate with CARB and to hearing from you.

Best regards,

Leticia Phillips

UNICA