



August 5, 2020

Via Electronic Submittal: https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=cn-fuels-infra-ws&comm_period=1

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

RE: RPMG Comments on Fuels Workshop in Developing Carbon Neutrality Policies for California

Ms. Sahota:

RPMG Inc. (RPMG) appreciates the opportunity to comment on this important discussion related to establishing Carbon Neutrality policy for California¹.

The July 15th workshop focused on fuels and infrastructure, critical aspects of the entire Carbon Neutrality picture for the state, and an area where companies like RPMG can play a significant role in helping the State achieve its goals. As a biofuel marketing company, RPMG partners with ethanol facilities located throughout the Midwest to provide both ethanol and distiller's corn oil (DCO) as essential renewable and low-CI inputs to the California fuels market. Our plants have continually focused on innovation and real-world GHG reductions. RPMG and our affiliated producers are committed to the continuation of innovation at ever increasing rates for the products we supply to California.

We applaud CARB's efforts to implement AB/SB32 to reduce the greenhouse gases and appreciate the State's current recognition of the value of low-carbon biofuels. Given that liquid transportation fuels will be needed for the foreseeable future - approximately 20 million vehicles will still contain internal combustion engines by 2050². It is critical that the State continue to focus on programs such as the Low Carbon Fuel Standard (LCFS) to reduce the carbon intensity of fuels sold and used in California under any new Carbon Neutral policy scheme. Losing the innovation momentum currently occurring as a result of the LCFS would be counterproductive to the goals of the State.

Though the workshop agenda was focused on "Fuels and Infrastructure for a Carbon Neutral

¹ <https://www2.arb.ca.gov/our-work/programs/carbon-neutrality/carbon-neutrality-meetings-workshops>

² Solecki, M. Presentation at CARB Fuels and Infrastructure for a Carbon Neutral Economy workshop. July 15, 2020.
https://www2.arb.ca.gov/sites/default/files/2020-07/ajw_cn_fuels_infra_july2020.pdf

Economy”, there was no representation from liquid fuel providers to highlight the innovation and investment being implemented in the sector. Innovations, happening today include:

- Carbon Capture and Storage,
- Cellulosic biofuels,
- Increased use of renewable power in production to lower carbon intensities,
- Flex Fuel (100% renewable E-85) combined with Plug-In Hybrid drive trains that can maximize consumer choice and the existing fueling infrastructure,
- Lower CI feedstock for Renewable Diesel and Biodiesel, and much more.

We believe this was a missed opportunity. CARB’s Carbon Neutrality policy should include, and not disregard, the existing infrastructure and production capacity for low and negative carbon liquid fuels.

RPMG would like to again thank staff for the opportunity to focus on these important issues. Please contact me at (952) 465-3247(jwhoffmann@rpmgllc.com), or our Sacramento representative, Jon Costantino at 916-716-3455 (jon@tradesmanadvisors.com) with any questions or comments.

Sincerely,

/s/

Jessica W. Hoffmann
Regulatory and Compliance Manager
RPMG Inc.