

April 23, 2020

Alexander "Lex" Mitchell
Manager, Emerging Technology Section
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

RE: Comments on Proposed Amendments to the Alternative Diesel Fuel Regulation

Dear Mr. Mitchell,

Thank you for your continued work on the Alternative Diesel Fuel (ADF) Regulation. As you may remember, we supported its creation and have followed the evolution of the ADF since enacted. The ADF regulation is important for companies like ours, bringing innovative fuels such as renewable DME (rDME) to market, as the rule provides a pathway by which such fuels can be commercialized. As part of a \$2.9 million California Energy Commission grant initiated in July 2019, Oberon Fuels will be submitting an ADF Stage 1 application prior to the testing of DME-powered vehicles in the next six months.

The potential ADF amendments as proposed raise some concerns. Specifically:

- The sweeping nature of this rule change has no precedence and is inconsistent with other CARB-based fuels, as none are required to undergo double testing. We understand the need to address specific issues with specific additives and formulations. We would suggest that if there are problems specific to certain additives and formulations, those should be clearly identified and isolated in the rule change language so as to avoid unintended consequences for innovative fuels that do not present such concerns.
- While we understand the challenges associated with the fuel blends tested, we are concerned that expanding the testing requirements for fuel additives and formulations as stated could also mean expanded testing requirements for innovative fuels such as rDME. This would add another hurdle for innovative, ultra-low carbon fuels coming to market. In order to move from Research & Development to Commercialization Stage, innovative fuels are already required to overcome numerous testing and market barriers. Adding additional testing requirements could stifle innovation.
- Costs: By requiring two labs to perform the same tests and by following the proposed guidelines, testing required would significantly increase the cost and time to bring new fuels to market.

Our request:

- Provide an additional three months for stakeholders to engage with ARB Staff on this topic and collaborate on a remedy that addresses your staff's concerns and our need for flexibility and innovation in these difficult times.

No one wants unintended consequences of modified certification requirements. As such, please consider providing additional time to collaborate with stakeholders like us.

Thank you for your consideration. We look forward to continuing to work with you on the ADF and bringing innovative fuels to market.

All the best,



Rebecca Boudreaux, Ph.D.
President, Oberon Fuels

