

ARB Docket Comments System (docket)

Subject: CA-GREET 3.0 / Simplified Calculator Comments

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Thank you for giving us the opportunity to comment on the new simplified calculator and 3.0 model.

Simplified Model

1. No Biomass as fuel input (previously in the Tier 1 calculator)
2. No Biogas as fuel input (previously in the Tier 1 calculator)
3. No ability to enter user defined chemical inputs. Producers can and will optimize chemical input use.
4. No credit for corn oil offsetting soy oil in biodiesel markets

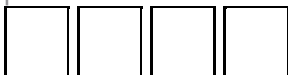
CA-GREET 3.0

1. Inputs tab has several broken links to the ETOH tab
2. No credit for corn oil offsetting soy oil
3. In RNG tab, Cell F594, comment by CARB "CO2 from RNG usage is zeroed due to baseline use of LFG to NG". This means the CO2 emissions from RNG combustion are biogenic and are cancelled out by the CO2 absorbed into biomass. However, in EtOH tab, Cells S525 to S529, to calculate the emissions related to biomethane, emission factors of NG in "EF" tab are used. In EF tab, Cells B16 to H16, the CO2 from NG is about 59,000 g/mmbtu. As a result, these CO2 emissions are double-counted. The values in Cells B16 to H16 should be 0, or close to 0 for RNG.

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