

April 27, 2018

**Deepika Nagabushan; Clean Air Task Force**  
**Comments at the public hearing to consider proposed amendments to the low carbon fuel standard regulation and to the regulation on commercialization of alternative diesel fuels**

Good morning Madam Chair and Members of the Board, my name is Deepika Nagabushan. I am an energy policy associate at Clean Air Task Force and I represent our team of technology, policy and geology experts.

For more than two decades now CATF has worked on market-based policy solutions to the climate challenge. Most recently, we succeeded in a multi-stakeholder effort to extend and expand the federal 45Q tax incentives encouraging carbon capture utilization and storage.

CATF fully supports and appreciates CARB's efforts to admit CCS into the LCFS. As we all know, the IPCC modeling suggests that meeting even the 2-degree climate goal will be extremely costly and difficult without the use extensive of CCS. So, kudos to CARB for taking a leadership role in creating a pathway for CCS to play its role in climate change mitigation, starting with the transportation sector.

We believe that the LCFS credit market will provide an added economic incentive for more CCS projects to be developed helping meet California's near-term and mid-century climate goals.

Not just that, we believe that LCFS credit market could catalyze a CO<sub>2</sub> reduction industry outside California as well, laying foundations for deep decarbonization across the nation. A CO<sub>2</sub> reduction industry could emerge in the form of networked capture, transport and storage infrastructure that could eventually deliver several millions of tons of emissions reduction on an annual basis.

On the CCS protocol – CATF has engaged the ARB staff in hours of discussions over multiple meetings on our technical recommendations.

Briefly, we are advocating that CARB adopt a performance-based approach, which will add more certainty and security to the stored CO<sub>2</sub>. In a performance-based approach, site selection, monitoring and verification requirements are tailored to local geology and conditions, and the verification plans are expected to be fit for purpose rather than being rigid.

We appreciate some of the measures CARB has already taken, in the earlier rounds of drafts to make the CCS protocol more performance based. This will ensure the best and the most secure projects are implemented.

Our other technical recommendations will help the Protocol become broader and provide more certainty for CO<sub>2</sub> storage in depleted oil fields, making storage more secure.

In conclusion, I would emphasize that CATF fully supports CCS under the LCFS rule. We recommend making more parts of the CCS protocol performance-based and structured to leverage technological and scientific advances as well as project experience.