

Iogen Corporation

Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels

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Submitted on CARB website at <https://www.arb.ca.gov/lispub/comm/bclist.php>

August 30<sup>th</sup>, 2018

Transportation Fuels Branch  
Industrial Strategies Division  
California Air Resources Board

Re: Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels

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## INTRODUCTION

Iogen Corporation (“Iogen”) would like to thank California’s Air Resource Board (CARB) for the opportunity to comment on the Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the Regulation on Commercialization of Alternative Diesel Fuels.

### **The proposed changes that relate to renewable hydrogen refinery credit program will create policy certainty and enable the use of renewable hydrogen credits within California refineries**

Iogen supports the suggested changes around renewable hydrogen refinery credit program in the draft regulatory text. CARB has proposed changes that will create policy certainty and enable renewable hydrogen usage within California refineries, which include:

- Removing the term “pilot” in the title of the program
- Removing the requirement that RHC must replace a minimum 1% of fossil hydrogen
- Removing the requirement that RHC will generate a maximum of 10% of annual compliance obligations
- Removing a limit that credits created may not be sold or transferred to any another party

Iogen also supports the proposed changes that relate to the calculation of credits for the renewable hydrogen refinery credit program. The credit calculation definition now appropriately includes the biogenic credit for the renewable natural gas (RNG) usage, which will offer a level playing field between the use of RNG for the production of either CNG or the renewable hydrogen refinery credit program.

Iogen also supports the proposed changes to the definition of “biomethane”, which now includes biomethane used for the production of renewable hydrogen.

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We appreciate CARB's commitment to improving the LCFS program and enabling a diverse set of solutions for credit generation. We look forward to advancing the renewable hydrogen refinery credit program in California.

Should CARB have any questions, require any information, or be interested in assistance in understanding our analyses or positions, we welcome further discussion and review.

Sincerely,



Patrick J. Foody  
Executive Vice President and Chief Operating Officer  
Iogen Biogas Corporation