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October 22, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95812

Att'n: Mr. Wes Ingram, Manager, Fuels and Evaluation Section
Mr. Chan Phan, Air Resources Engineer

RE: LCFS Program - Comments on Proposed Changes to the California GREET Model

Dear Mr. Ingram and Mr. Phan,

IMPCO Technologies, Inc. appreciates the opportunity to comment on ARB staff's proposed changes to the California GREET model under efforts to reauthorize the Low Carbon Fuel Standard (LCFS) regulation.

IMPCO Technologies, Inc. has been headquartered in Southern California for over 50 years, employs 133 people in the state of California and 221 throughout the nation. IMPCO is engaged in the design, manufacture, and supply of advanced alternative fuel systems and components to enable internal combustion engines to operate on clean-burning, low-emitting gaseous fuels such as natural gas. Markets include the automotive, industrial, and power-generation industries. In 2013, IMPCO and its sister company BRC were the world's largest component/system supplier for alternative fuels equipment and generated \$400,000,000 in revenue, thus significantly contributing to California's economy.

We are writing to indicate our overall support for reauthorization of the LCFS. However, **we urgently request that ARB allow additional time for review of, and potential modifications to, its proposed changes to the CA-GREET model.** ARB staff have made clear that methane leakage is a very complex issue. There is much uncertainty with the existing data, and significant new data on this and other related issues should be available in the next six to twelve months. It is premature to change the carbon intensity values for natural gas (or any other fuel pathways) before that information becomes available. We, therefore, urge ARB to postpone updating the CA GREET model to allow sufficient time to obtain, review and incorporate emerging, peer-reviewed information about methane leakage (approximately six to twelve months). As we understand it, ARB can reauthorize the LCFS legislation in February 2015 without rushing to update the CA-GREET model.



The LCFS has been a positive force for alternative fuels. IMPCO strongly believes that it is critically important to improve the science on which this program is based. We therefore respectfully ask ARB to separate reauthorization of the LCFS from adoption of new CI values in the CA-GREET model, at a minimum until the peer-reviewed data on methane leakage is available and can be fully considered

Please call me at (714) 656-1245 if you have any questions.

Best Regards,

A handwritten signature in blue ink, appearing to read "Karen Szabo".

Karen Szabo

Director, Certification and
Regulatory Affairs