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Deepika Nagabhushan



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Deepika Nagabhushan; 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 Chairwoman Nichols and members of the Board. Thank you for the opportunity to testify. My name is Deepika Nagabhushan. I am an energy policy associate at Clean Air Task Force (CATF). Our mission is to help decarbonize global energy system through advocacy for technology innovation and policy development, and partnership with the private sector.

Geologic trapping of CO₂ is a mature technology. Forty-five years worth of record suggests that atmospheric leakage of CO₂ from properly-sited geologic reservoirs is extremely unlikely. Given this, carbon capture and geologic CO₂ storage can play an important role under the LCFS.

I want to congratulate the team at ARB for their leadership in developing the Protocol, which allows CCS projects to contribute to meeting California's climate targets under the LCFS. CATF fully supports the incorporation of the CCS Protocol into the LCFS.

We appreciate the opportunity to have recommended targeted changes to earlier drafts of the Protocol, and we appreciate that some of these recommendations have been included.

One thing that we have communicated to ARB previously, and would want to continue to engage with ARB on, is that a risk-based approach to monitoring and verification will provide the greatest security for stored CO₂. Risk-based approach would mean a) identifying and requiring targeted monitoring and verification where the leakage risk would be most probable and b) utilizing monitoring and modeling to determine when injected CO₂ has stabilized and leakage risk is negligible. We look forward to working together further improve the Protocol, resulting in greater assurance of CO₂ storage security. To this end, CATF joins the recommendation presented just now by NRDC and requests the Board to direct ARB to evaluate a risk-based post-injection monitoring approach.

The recently enacted SB 100 establishes the important goal of 100% clean electricity by 2045. In addition, Executive Order B-55-18 appropriately goes even further and sets the target of state-wide carbon neutrality by 2045, followed by maintaining net negative emissions thereafter. As a result, this CCS Protocol becomes even more important for California's climate goals. Which means, that not only might CCS play an important role in the LCFS and through the cap and trade programs, but it will almost certainly play a crucial role in the pursuit of negative emissions through the use of Direct Air Capture or Bio Energy CCS.

Once again, CATF fully supports the CCS Protocol and urges the Board to adopt the proposed resolution language. Thank you.