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| Rajinder Sahota  Division Chief, Industrial Strategies Division  California Air Resources Board  1001 I Street Sacramento, CA 95814 | |  |
| Date: 5.11.2020 | **LCFS Novel Technology Investment Credit Program** | |

Dear Ms. Sahota:

I am writing to you to express support for the Novel Technology Investment Credit (NTIC) program presented by Virent and Marathon in the LCFS Public Workshop on Oct. 15, and on behalf of Johnson Matthey encourage CARB to move the NTIC program into the next rule making process for incorporation into the LCFS.

Johnson Matthey is a global leader in science that enables a cleaner and healthier world. With over 200 years of sustained commitment to innovation and technological breakthroughs, we improve the performance, function and safety of our customers’ products and in 2020 we received the London Stock Exchange’s Green Economy Mark, given to companies that derive more than 50% of revenues from environmental solutions. Our science has a global impact in areas such as low emission transport, pharmaceuticals, chemical processing and making the most efficient use of the planet’s natural resources. Today, over one in three cars and trucks are fitted with a Johnson Matthey catalytic converter - technology which, over the years, has had a major positive impact on air quality in California and across the globe.  Johnson Matthey is also developing new technologies on its own and with partners to develop technologies to produce bio-gasoline, biodiesel and sustainable air fuel and is a world leader in the development of innovative battery materials and hydrogen fuel cells, all of which could help bring low carbon fuel solutions to California.

Johnson Matthey supports the NTIC program because we believe it is the correct approach to advance the growing need for low carbon fuels in California. It will help and encourage companies, like ours, bring new technologies for low carbon fuels to commercial scale. We believe the program is correctly structured to limit the LCFS program’s risk in that project investors will need to demonstrate the technologies ability to deliver an economically viable low carbon solution prior to receiving the New Technology Investment Credits. Additionally, administrative controls to limit the number of credits awarded to between five and seven and a half percent of deficits will help to ensure existing investments are not placed at a disadvantage. Additionally, the credits can be implemented under the existing CARB administrative infrastructure with no cash outlays by the State of California. We believe that the NTIC program will bring significant additional investments into new low carbon fuels technologies, resulting in significant increases in production and hence availability of low carbon fuels.

For these reasons, Johnson Matthey encourages you to move the NTIC program forward in the CARB rule making process.

Best Regards

Mark Sutton, Business Development Director