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January 7, 2022

Dr. Cheryl Laskowski
Transportation Branch Chief
California Air Resources Board
1001 I Street
Sacramento, CA 95814

(Comment submitted electronically via Comment Submittal Form at https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=lcfs-wkshp-dec21-ws&comm_period=1)

RE: Infinium Operations, LLC Comments on the December 7, 2021 LCFS Workshop – Potential Future Changes to the LCFS Program

Dear Dr. Laskowski,

Infinium Operations, LLC ("Infinium") is pleased to submit comments in support of future changes to the LCFS program. We strongly support low carbon transportation fuel programs such as LCFS, as they send a strong market signal to decarbonize the transportation sector, are performance based, and provide long-term policy stability that supports investment.

Infinium's mission is to decarbonize the transportation sector through the production of Electrofuels, an ultra-low carbon fuel alternative to petroleum derived transportation fuels. Infinium Electrofuels are drop-in replacements for use in planes, ships and motor vehicles without the need of costly infrastructure changes. Infinium's proprietary technology utilizes carbon dioxide (CO_2) that would otherwise be emitted, renewable power, and water as feedstocks to produce transportation fuels, with substantial reductions in lifecycle carbon emissions and lower carbon intensity (CI) as compared to fossil-based alternatives.

We respectfully request that CARB consider our input on the following topics:

Strengthen Pre- and Post- 2030 CI Targets

Infinium supports CARB's examination of the maximum feasible CI reductions and establishment of more aggressive CI targets pre and post 2030 to accelerate developments and innovations to decarbonize transportation fuels. Such a change would send positive market signals as well as increase investor confidence in the program.

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Expand Book and Claim Accounting for Low-CI Hydrogen

We support CARB's concept to expand book-and-claim accounting for low-CI hydrogen injected into distribution systems. Regional hubs represent an emerging model of production and delivery of hydrogen to end-users. Such systems involve multiple hydrogen production sources connected to multiple end users through common distribution systems. Allowing book-and-claim accounting would facilitate and incentivize low-CI hydrogen production and use both as a fuel and in low-CI fuel production. Chain of custody of the environmental attribute could be demonstrated and documented by robust tracing of specific sources going into a fuel production facility or claimed as a fuel, similar to the existing LCFS requirements for biomethane and renewable power.

Methodology for Utilization of Captured Carbon Dioxide

Recent advancements have enabled utilization of captured carbon dioxide as a feedstock for production of synthetic low-CI transportation fuels at commercial scale. Methodologies for the treatment of captured carbon dioxide established under the LCFS CCS Protocol should be extended or adapted to apply to the utilization of captured carbon. This includes considerations to account for GHG emissions associated with capture, transport and the utilization process.

In addition, similar to hydrogen, regional and inter-regional pipeline hubs for delivering captured carbon dioxide to multiple users (e.g., for utilization, sequestration, etc.) are being developed through support established by the federal bipartisan infrastructure deal. It will be important that provisions allow for tracking of the environmental attributes of the carbon dioxide when these CO_2 distribution systems are used in conjunction with utilization processes.

Thank you for the opportunity to provide comments. Should you have any questions or would like additional information, please feel free to contact me at dzaziski@InfiniumCo.com.

With kind regards,

David Zaziski, Ph.D.
Vice President, Policy & Government Affairs