



November 5th, 2020

Rajinder Sahota
Division Chief, Industrial Strategies Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Recommended LCFS Workshop Issue – Support for Enabling Low Carbon Intensity Power Sourcing by Fuel Production Facilities.

Dear Ms. Sahota:

I am writing to you to express Virent's support to the public comment from Fulcrum BioEnergy submitted on 11-2-2020 regarding Low-CI Power Sourcing for Facilities. Virent also believes that by adding Low-CI Power sourcing flexibility for all low carbon fuel production facilities, CARB would decrease demand for fossil power and increase demand for Low-CI Power. It will also improve the overall carbon footprint for low carbon fuels and further the goals and objectives of the LCFS program.

The current requirement for a dedicated connection behind the utility meter between the Low-CI power generation source and the biorefinery causes additional complexity and may challenge feasibility based on the geographical area of the plant and the associated renewable electricity mix. The requirement of co-developing a dedicated renewable power source on an advanced biorefinery also dramatically increases its capital cost and adds another element of risk to the overall project development.

Virent is commercializing technology to create the low-carbon fuels and chemicals the world demands using a wide range of naturally occurring, renewable resources. Our patented technology features catalytic chemistry to convert plant-based materials into a full range of products identical to those made from petroleum, including gasoline, diesel and jet fuel, as well as the chemicals for plastics and fibers, such as bio-paraxylene, benzene and toluene. Our products are drop-in replacements for their petroleum equivalents and enable full utilization of the existing logistics infrastructure. Allowing for the sourcing of Low-CI Power via power purchase agreements, along with the adoption of the Novel Technology Investment Credit (NTIC) program, will assist Virent in bringing this technology to market and ensuring its ability in the long term to supply renewable fuels into California.

Best Regards,

Dave Kettner
President & General Counsel
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