



October 26, 2020

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

Dear Ms. Sahota:

I am writing to you to express support for the Novel Technology Investment Credit (NTIC) program that was presented by Virent and Marathon in the Low Carbon Fuel Standard (LCFS) Public Workshop on Oct. 15, and Aequor Inc. encourages CARB to move the NTIC program into the next rule making process for incorporation into the LCFS.

Aequor Inc is a woman-owned small business located in JLab-San Diego. Our novel "green," non-toxic chemical treatments were validated by DOE to boost algae and yeast biomass production by up to 40% in half the time, without the need for antibiotics or antimicrobials. This breakthrough saves energy, water and labor costs, and directly increases our customers' margins and profitability in the low carbon fuel sector in California.

Aequor Inc 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 companies, like ours, bring new technologies to improving low carbon fuels to commercial scale. We believe the program is correctly structured to limit the LCFS programs risk in that investors will need to take the upfront risks to demonstrate the new technology is commercially and operationally viable. 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 and 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 of low carbon fuels.

My company aims to service the growing global market for our biomass boosters, improving the feasibility and profitability of algae and seaweed cultivation, biomass fermentation, and job creation in our home State of California.

For all these reasons, Aequor Inc encourages you to move the NTIC program forward in the CARB rule making process.

Best Regards,

Marilyn J. Bruno, Ph.D., J.D.

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