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August 27, 2024

Clerks' Office
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Proposed Amendments to the Low Carbon Fuel Standard (15-Day Changes)

Mainspring Energy, Inc. ("Mainspring") appreciates the opportunity to submit comments to the California Air Resources Board ("CARB") on the Proposed Amendments to the Low Carbon Fuel Standard (15-Day changes) released August 12, 2024. Specifically, we appreciate the development of the amendments, including the 9% proposed stepdown, and support adoption of the proposal.

Driven by its vision of the affordable, reliable, net-zero carbon grid of the future, Mainspring has developed and commercialized a new power generation technology —the linear generator— delivering local power that is dispatchable and fuel-flexible. Mainspring's linear generator offers a unique non-combustion capacity and energy solution that simultaneously addresses the critical need of reducing greenhouse gas and criteria pollutant emissions, while also enhancing grid reliability and resilience. Linear generators use a low-temperature, uniform non-combustion reaction that maintains peak temperatures below the levels at which NO_x forms (1500°C), resulting in near-zero NO_x emissions at all loads – including during start-up. This contrasts with the combustion of a fuel with a non-homogenous flame-front, a process that results in higher temperatures and high NO_x emissions.

Modular and scalable, Mainspring's linear generators can be deployed near load, either customer- or grid-sited, with the ability to immediately generate electricity from a range of renewable fuels – including both 100% hydrogen and ammonia (a hydrogen carrier). Mainspring's inverter-based technology offers a full range of valuable grid benefits including fast (and unlimited daily) starts/stops, a wide dispatch range from minimum to maximum load, quick ramping, and in many cases on-site fuel storage which allows linear generators to firm renewables for short or extended

periods of time, thereby facilitating the continued rapid adoption of a reliable renewable energy grid.

The LCFS has been a highly successful program as part of a broad package of regulations and incentives to address climate change. Currently the LCFS is overperforming as the carbon intensities are too easy for the market to meet, leading to low credit prices that are undermining investment in electric cars, trucks, buses, and charging infrastructure, as well as infrastructure for other low-carbon fuels. For the LCFS program to continue to be successful, it is essential that the stringency be increased expeditiously and be implemented as soon as possible to ensure the LCFS continues to contribute substantially to the state's clean air, climate change, and zero-emission transportation requirements and goals. Within the proposed amendments, we strongly support CARB's proposal for a 9% step-down in 2025, which will help relieve the surplus in credits and help support the market and credit pricing so that it can efficiently incentivize low carbon fuels and reduce emissions.

As a California based manufacturer, Mainspring appreciates the development of the 15-Day Proposed Amendments to the LCFS. We strongly support the LCFS program, the development of the amendments, and encourage staff to move forward with the proposal at the November Board Hearing and encourage approval by the Board. This provides industry and stakeholders with the certainty needed for LCFS to be successful to planners, implementers, and investors.

Sincerely,

Kent Leacock
Senior Director, Public Affairs
Mainspring Energy