



August 27, 2024

Submitted electronically: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>
The Honorable Liane Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, California 95814

Dear Chair Randolph:

Electrochaea Corporation (Electrochaea) appreciates the opportunity to submit a public comment on the proposed amendments to the Low Carbon Fuel Standard 15-Day Changes recently posted by the California Air Resources Board. Electrochaea's comments are in support of the increase in stringency of the annual carbon intensity benchmarks.

Electrochaea is a technology provider for a process that produces low CI synthetic methane using CO₂ and hydrogen. Our process uses a microorganism, an archaea, to synthesize methane at grid scale which can be used as RNG/biomethane to replace fossil fuels in transportation and beyond.

Electrochaea supports the proposed modification to Section 95484 of the annual carbon intensity (CI) benchmarks to further advance the States attainment of a net-zero carbon economy. The proposed 9% reduction in the annual CI benchmark for fuels, used as a substitute for fossil fuels, from the previously proposed 5% reduction, is a welcome modification. The increased stringency should have a positive outcome on the further adoption of low CI fuels in the California transportation market.

Electrochaea also supports the Automatic Acceleration Mechanism as described in Section 95484. This mechanism, designed to bring into balance the credit bank, credits, and deficits in the LCFS program, can reduce the oversupply of credits and provide a market signal to sustain the success and importance of the LCFS program.

Electrochaea supports science-based approaches and technologies that can reduce the use of fossil fuels and reduce GHG emissions. Use of low CI synthetic methane is an important component in the fight against climate change. Thank you for your consideration of our public comment.

Sincerely,

/s/ Chris Wilson

Chris Wilson
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