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April 21, 2025

Rajinder Sahota

Deputy Executive Officer for Climate Change & Research

California Air Resources Board

1001 I Street

Sacramento, CA 95814

RE: World Energy's Comments on the Third 15-Day Changes for the Low Carbon Fuel Standard

Dear Ms. Sahota and CARB Staff,

World Energy appreciates the opportunity to provide comments on the Third 15-Day Changes for the Low Carbon Fuel Standard (LCFS). We would like to thank CARB staff for their ongoing work throughout the rulemaking process, and the swift turnaround to address the Office of Administrative Law's concerns regarding the rulemaking package submitted in January 2025. World Energy is supportive of CARB's forward progress in finalizing the LCFS rulemaking. An expeditious resubmission to OAL is crucial to grant long-awaited market clarity to LCFS participants.

World Energy is one of the largest and longest-serving advanced clean energy suppliers in North America. We were the world's first producer of sustainable aviation fuel (SAF) and remain leaders in the field of renewable fuels. Our facility in Paramount, CA is in the final stages of conversion from a petroleum refinery to a 100% renewable fuels bio-refinery. When completed, World Energy's Paramount facility is projected to increase production capacity to approximately 350 million gallons of low carbon fuels (primarily SAF) per year.

The LCFS plays a major role in driving investments in the low carbon fuel market. The stringent, long-term signals are crucial to developing technologies and low carbon fuels, including World Energy's SAF. These investments support further developments and innovations for additional carbon intensity (CI) reductions. The LCFS is a technology neutral, cost-effective approach to reducing the GHG emissions from transportation, and pursuing the cleanest fuels possible for off-road uses, like aviation.

We continue to support the 2025 CI benchmark as previously proposed in the January 2025 rulemaking package, § 95484(d) through (f). We hope to see the adoption and finalization of this rulemaking as soon as possible so that the anticipated reductions from the amendments can be captured. The completion of this rulemaking will provide LCFS participants with long-term certainty needed to invest in new technologies and right-size the currently overflowing credit bank to ensure the program remains an effective driver of emissions reductions in California's transportation sector.

Thank you for the opportunity to provide comments.

Sincerely,



Scott Lewis
President, World Energy Net-Zero Services