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Todd R. Campbell, MEM, MPP  
Vice President, Public Policy and Regulatory Affairs

December 15, 2011



Ms. Mary D. Nichols, Chair  
Members of the Governing Board  
California Air Resources Board  
1001 "I" Street  
P.O. Box 2815  
Sacramento, CA 95812

**RE: Clean Energy strongly supports the proposed Amendments to the Low Carbon Fuel Standard Regulation as presented by staff.**

Dear Chairman Nichols and Members of the Air Resources Board:

Clean Energy is in **strong support** of the proposed amendments to the Low Carbon Fuel Standard (LCFS) Regulation before the Governing Board. It is our belief that staff has carefully reviewed the program's progress through this initial year and has determined that not only is the program solvent for compliance purposes, but that low carbon fuel production is continuing to ramp up to meet the needs of regulated parties to achieve the standard's 2020 low carbon fuel reduction goal of 10 percent.

Clean Energy staff has worked very closely with Air Resources Board (ARB) staff over the past few years to address a number of the Natural Gas Vehicle Industry's concerns pertaining to the initial rulemaking. These concerns dealt with the original Energy Efficiency Ratio applied to medium- and heavy-duty natural gas vehicles, fuel quality concerns for mobile applications for territories covered by Southern California Gas Company and San Diego Gas & Electric utilities, and the ability for renewable natural gas fuel providers to deliver this ultra low carbon product to the California market in an efficient and enforceable manner. Further, Clean Energy was an active participant of the LCFS Advisory Committee and would like to commend the leadership of Mr. Richard Corey and his staff for professionally addressing many stakeholders concerns by providing reasonable and well thought out solutions that make the LCFS regulation functional.

Clean Energy was proud to make up nearly nine percent of the LCFS credit market for the first quarter of 2011. As we start to deploy our American Natural Gas Highway in 2012 and ramp up our production of renewable natural gas (also known as biomethane) through our subsidiary, Clean Energy Renewable Fuels, we hope to demonstrate to this agency that natural gas, conventional and renewable, can and will provide a meaningful low carbon fuel solution to the transportation sector for decades to come. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd R. Campbell", is written over a large, circular scribble.

Todd R. Campbell