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Priorities for the Low Carbon Fuel Standard Advisory Board

Thank you for the opportunity to provide feedback on the priorities of the LCFS Advisory Board.

From Propel Fuels' perspective, two of the topic areas will have disproportionate impact on the successful implementation of the LCFS and therefore should be amongst the Advisory Board's top priorities. These topics focus on enabling the expansion of the supply chain downstream of the production of ultra-low carbon fuels, such that the fuels can conveniently reach customers and be adopted in sufficient quantities as to achieve the goals of the LCFS.

These priority topics include:

11) Identification of hurdles or barriers (e.g. permitting issues, infrastructure adequacy, research funds) and recommendations for addressing such hurdles or barriers. Themes to consider:

1. How can the State expand public/private partnerships to address the shortage of bulk storage, fuel-blending facilities, and vehicle filling infrastructure, all of which are essential to fulfill the goals of the LCFS?
2. How might the CARB facilitate coordination amongst State and Local agencies responsible for permitting the development and construction of production, distribution and marketing infrastructure to reduce the time and cost of implementation and hence reduce risk?

5) The availability and use of ultralow carbon fuels to achieve the LCFS standards and advisability of establishing additional mechanisms to incentivize the use of higher volumes of these fuels. Themes to consider:

1. How can the State work with industry to bring new fuel options into the market with greater speed and efficiency? For example by creating a fast-tracked testing and approval process that yields greater market certainty for new blends of ethanol, renewable diesel, and mixed-component fuels?
2. What actions can CARB take to develop and sustain carbon credit market transparency with regard to supply, demand and pricing of carbon credits and the process for exchanging these?

Lastly, the CARB has a challenging agenda to cover all of the topics mandated with the establishment of the Advisory Board. Each meeting going forward CARB Staff should guide the LCFS Advisory Board to focus on framing those greatest enablers, and greatest barriers, to achieving successful LCFS implementation, and options to overcome those barriers.



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The depth and diversity of expertise held by the Board members can be best leveraged by eliciting advice as to what conditions are necessary for the LCFS to work, what scenarios must be avoided, and how. Through both the pre-work of the Staff, and the moderation of the Board's discussions, these essential elements can be brought to the fore each meeting, for highest value-added.

I look forward to continued participation in this body's work.

With best regards,

A handwritten signature in black ink that reads "Jim Iacoponi". The signature is written in a cursive, flowing style.

Jim Iacoponi
Vice President of Operations
Propel Fuels