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Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	263678
Document Title:	Peterson Power Systems Comments on the May 21, 2025 Scoping Meeting
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Comment Received From: Peterson Power Systems
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**Peters Comment on the May 21, 2025 Scoping Meeting on
Proposed Updates for the RPS Eligibility Guidebook, Tenth Edition**

Additional submitted attachment is included below.



June 2, 2025

California Energy Commission
Docket Unit, MS-4
Docket No. 21-RPS-02
715 P Street
Sacramento, CA 95814

***RE: Public Comment on the May 21, 2025 Scoping Meeting on Proposed Updates for the
Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition***

Dear Commissioners and Staff:

The California Energy Commission's Renewable Portfolio Standard Eligibility Guidebook ("the Guidebook") was formally adopted by the Energy Commission on April 21, 2004. Since its release and adaptation, it has been revised eight times and is currently in its ninth edition. It was last revised in January 2017.

Peterson Power Systems, a leading Caterpillar dealership headquartered in San Leandro, CA since 1936 supports the CEC in revising the RPS handbook and is appreciative of the work staff is doing in developing the tenth addition. Indeed, many advancements have been made since 2017 and there have been many changes to the California market over this time.

In our initial comments to staff's proposed revisions to the guidebook issued on October 18, 2024 , Peterson agreed with all of staff's proposed areas to be considered for revision and respectfully pointed out the omission of Hydrotreated Vegetable Oil ("HVO" or "Renewable Diesel") as a renewable fuel in Chapter 2. While the Guidebook briefly addresses Biodiesel in Chapter 2: Energy Resource Eligibility Requirements, the Guidebook fails to address HVO.

Quite candidly, we are surprised and disappointed that the CEC has neglected to address HVO in the scoping meeting held on May 21, 2025.

HVO and biodiesel are NOT the same fuel. HVO is produced most often by hydrotreating and also via gasification, pyrolysis, and other biochemical and thermochemical technologies. It meets ASTM D975 specification for petroleum diesel. Biodiesel is a mono-alkyl ester produced via transesterification. Biodiesel meets ASTM D6751 and is approved for blending with petroleum diesel.¹

¹ US Department of Energy – Alternative Fuels Data Center: <https://afdc.energy.gov/fuels/renewable-diesel>



HVO is 100% renewable and can be used in existing diesel engines without modification. HVO meets California Air Resource Board (CARB) motor vehicle fuel specifications under Title 13, California Code of Regulations (CCR), section 2281 et seq., and meets the aromatic, sulfur, and lubricity standards, of ASTM specification D975-12a.1. Moreover, CARB is mandating the use of HVO in both the harbor craft and off-road in-use rules due to its significant demonstrated emissions reductions.

Compression ignition engines will remain the industry standard in underwriting the “insurance” necessary to maintain the electrical system and mitigate the potentially disastrous effects of utility outages at hospitals, wastewater treatment plants, police and fire stations and other critical societal infrastructure for many years to come. As a leader in the fight against climate change, California should not wait for federal action but instead be encouraging the use of renewable fuels such as HVO. In addition to being 100% Renewable, using HVO instead of fossil diesel results in significant GHG (70+ % reductions) and criteria pollutant reductions, HVO is an available option that moves us closer to the state’s climate goals.

It is important that HVO be included in the Scope of the draft RPS Guidebook, Tenth Edition. As such, Peterson Power Systems reiterates its request to have HVO recognized in chapter 2 of the tenth edition of California’s RPS handbook.

Peterson appreciates the opportunity to submit these comments and we look forward to continued productive participation in this proceeding.

Respectfully,

A handwritten signature in blue ink, appearing to read "Greg Lamberg". The signature is fluid and cursive, with the first name "Greg" and last name "Lamberg" clearly visible.

Greg Lamberg
Director, Transitional Energy Technologies & Regulatory Policy
Peterson Power Systems