DOCKETED	
Docket Number:	21-RPS-02
Project Title:	Renewables Portfolio Standard 10th Edition Guidebook Update
TN #:	266583
Document Title:	October 6, 2025 Staff Workshop
Description:	N/A
Filer:	System
Organization:	Peterson Power Systems
Submitter Role:	Public
Submission Date:	10/14/2025 10:32:50 AM
Docketed Date:	10/14/2025

Comment Received From: Peterson Power Systems
Submitted On: 10/14/2025
Docket Number: 21-RPS-02

Peterson Power Systems Comments to the October 6, 2025 Staff Workshop

Additional submitted attachment is included below.

October 14, 2025

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

RE: Public Comment on the October 6, 2025 Staff Workshop on the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth Edition

Dear Commissioners and Staff:

Peterson Power Systems, a California-based Caterpillar Dealership since 1936, and a recognized leader in the adaptation of renewable fuels, has commented in this proceeding numerous times. Our comments have repeatedly requested the inclusion of Hydrotreated Vegetable Oil (also known as HVO) in the definition of renewable fuels in Chapter 2 of the RPS Eligibility Guidebook. We are not the only participant in this discussion requesting the recognition of HVO as a renewable fuel in the 10th Edition of the RPS Eligibility Guidebook. Unfortunately, our expertise seems to have fallen on deaf ears, and we remain perplexed as to why the CEC has not included HVO in Chapter 2 of the proposed 10th edition of the RPS Handbook. While the Guidebook briefly addresses Biodiesel in Chapter 2, the Guidebook fails to address HVO. HVO and biodiesel are NOT the same fuel. HVO is most often produced by hydrotreating , as well as through gasification, pyrolysis, and other biochemical and thermochemical technologies. It meets ASTM D975 specification for petroleum diesel.

Biodiesel, on the other hand, is a mono-alkyl ester produced via transesterification. Biodiesel meets ASTM D6751 and is approved for blending with petroleum diesel. Typically, Biodiesel is 80% petroleum diesel and 20% biodiesel due to the undesirable characteristics of 100% Biodiesel.

HVO is 100% renewable and can be used in existing compression ignition engines without blending or 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.

Interestingly, the CEC Siting Division mandates HVO as the primary fuel in all newly sited compression ignition engines permitted as emergency back-up for data centers. Yet, this division of the CEC refuses to recognize and acknowledge HVO's demonstrated benefits as a renewable fuel.

HVO achieves higher GHG reductions than biodiesel. While biodiesel can increase NOx emissions, HVO lowers them. HVO produces less particulate matter than biodiesel and reduces CO emissions.

HVO has been recognized throughout the industry for its superior performance in GHG and air pollutant reductions compared to diesel, as well as its superior engine performance compared to biodiesel. This very Commission mandates it in new siting cases as an air quality mitigation measure, yet the CEC refuses to recognize it as a renewable fuel while continuing to recognize Biodiesel.

Consistency across policy and implementation will ensure that renewable fuels are treated equitably and effectively, aligning legislative intent with operational execution, reducing regulatory uncertainty, and fostering long-term investment in sustainable energy infrastructure. Despite the CEC touting to promote energy innovation and sustainability, the omission of HVO in the 10th edition of the RPS Handbook creates a policy gap that will hinder the deployment of lower-emission back-up generation technologies and limit progress toward achieving California's climate goals.

Peterson Power Systems appreciates your consideration of this request and we welcome the opportunity to provide further input.

Respectfully,

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