

DOCKETED

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April 2, 2018

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 17-ALT-01 - 2018-2019 Investment Plan Update for the ARFVTP

Thank you for the opportunity to comment on the California Energy Commission Investment Plan Update. We are writing to support the comments submitted by the California Advanced Biofuels Alliance.

We urge the commission to reinstate the previously proposed \$25 million for low carbon fuel production and supply and add to that total the \$25 million from Cap & Trade.

Biofuels provide roughly 90% of carbon reduction benefits under the Low Carbon Fuel Standard and biodiesel provides 20% of the carbon reduction in California's transportation sector.

With the projected increase in the ARFVTP budget from \$100 million to \$277.5 million, we ask only for our reasonable, fair share of the funds rather than having our sector's funds reduced essentially to zero and substituted with Cap and Trade Greenhouse Gas Reduction Funds. This unbalanced distribution is in opposition to the intent of the ARFVTP legislation to keep funding technology neutral.

Biofuels stand ready to increase their already impressive contribution to state climate goals. With a full \$50 million in funds our sector could invest in biodiesel storage and blending infrastructure, which could easily double blending levels of low-carbon biodiesel in the state within 18 months. Other technologies cannot compete with this timeline and we feel we can agree that nearly immediate GHG reductions are more beneficial than hypothetical reductions in the far future.

Should there be any questions, please free to contact me at (720)-475-5409 or hsimpson@crimsonrenewable.com

Sincerely,
Harry Simpson
President
Crimson Renewable Energy

