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Re: $25 Million for Low-Carbon Fuel Production and Supply

Please find attached comments from those in California's biofuels industry concerning the Investment Plan modification for Low-Carbon Fuel Production and Supply.

Additional submitted attachment is included below.
The Honorable Robert B. Weisenmiller  
Chair, California Energy Commission  
1516 9th Street  
Sacramento, CA 95814  

RE: Docket No. 17-ALT-01: $25 Million for Low-Carbon Fuel Production and Supply  

Dear Chair Weisenmiller:

The signatories to this letter support the proposed modification to the 2018-19 Investment Plan for a total of $25 million to be allocated for Low-Carbon Fuel Production and Supply in the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). However, we remain gravely concerned that a future attempt to cut funding for biofuels or change the statute from fuel and technology neutrality could occur. We urge the state to continue this current program in perpetuity, and it should be fully funded by ARFVTP and not by politically volatile GGRF.

ARFVTP provides competitive grants, revolving loans, loan guarantees and other much-needed funds for the production and deployment of low carbon fuels and innovative near-zero and zero-emission vehicle technologies to help attain the state’s climate change policies. It is technology and fuel neutral, and is making a positive contribution to the state’s climate and clean air goals. Any change to favor one technology or fuel would go against the intent of the bill which established the program. Please consider:

- ARFVTP provides approximately $25 million per year for biofuels that clean up our transportation sector;
- Biofuels are the most cost-effective means of immediately meeting petroleum and greenhouse gas reduction goals and provide 89 percent of all LCFS fuels sold in California;
- Any proposal to not make the program fuel and technology neutral would harm many private companies, wastewater and air quality agencies, utilities, labor, waste haulers and agencies, and others working to produce low carbon fuels in California;
- In-state biofuels production has the potential to create over 360,000 clean energy jobs in the state, and attract many investors interested in our market because of the huge demand that exists. Those investments will only happen if there is certainty in the marketplace;
- According to the Air Resources Board’s 2030 Climate Change Scoping Plan, biofuels are displacing fossil fuels as quickly as renewable power is under the state’s Renewable Portfolio Standard;
- In-state biofuels production saves Californians billions of dollars in reduced health care costs and reduced costs of petroleum consumption¹;

¹ Driving California Forward.
Carbon reduction: most biofuels emit less carbon than electric vehicles running on the California electricity grid. Biofuels from organic waste and dairy waste have carbon intensities of negative 31 and negative 256 while electric vehicles running on the California power grid have carbon intensities in the 40s;
Clean trucks and cars exist now for using these biofuels;
Biofuels production generates economic development and jobs in both disadvantaged and rural communities;
Biofuels production from organic waste helps California meet landfill reduction and Short-Lived Climate Pollutant goals.

For these reasons, we support the recommended modification, and must remain hyper-vigilant against any attempts to reduce funding or change the program in the future.

Sincerely,
Joy Alafia, Western Propane Gas Association
Rebecca Baskins, California Advanced Biofuels Alliance
Andy Foster, Aemetis
Nina Kapoor, Coalition for Renewable Natural Gas
Ryan Kenny, Clean Energy
Tom Koehler, Pacific Ethanol
Thomas Lawson, California Natural Gas Vehicle Coalition
Julia Levin, Bioenergy Association of California
Lyle Schlyer, Calgren
Russell Teall, JD, Biodico, Inc.

2 Source: California Low Carbon Fuel Standard