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Prometheus Comments - Follow-up on SB100

Additional submitted attachment is included below.

PROMETHEUS

December 18, 2020

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814
Docket No.: 19-SB-100
Submitted via email to: docket@energy.ca.gov

Subject: Comments re: SB 100 Joint Agency Report and Workshop

Dear Commissioners and Board Members:

Prometheus Fuels writes to supplement its prior comments submitted to the docket on Oct. 23, 2020. Prometheus reiterates its support for Senate Bill 100 (SB 100) and charting a path toward carbon neutrality in California by 2045. Prometheus also reiterates its appreciation for the work that the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), and the California Air Resources Board (CARB) each contributed in preparing the Joint Agency Report (the Report) and presenting the draft Report at the December 4, 2020 Workshop (Workshop).

Background

Prometheus removes carbon dioxide (CO₂) from the air and turns it into drop-in, zero-net-carbon CARB gasoline, diesel, jet fuel, and hydrogen. The only inputs to this process are air and electricity from solar and wind power, and the only outputs are fuel and oxygen. Every gallon of Prometheus fuel used on the road or in flight leaves a gallon of fossil fuel in the ground. Put another way, replacing all fuels that are now made from oil and gas with zero net carbon fuels made from renewable electricity can reduce global emissions by more than 10 gigatons of CO₂ per year, equivalent to approximately 25% of current annual global emissions.

Discussion

Prometheus recognizes that California's policy focus is on electrification. Governor Newsom's September 23, 2020 executive order directs California to require that, by 2035, all new cars and passenger trucks sold in the state be zero-emission vehicles.¹ Meanwhile, the Legislature's SB 100 establishes a policy requiring that renewable energy and zero-carbon resources supply 100% of electric retail sales to end-use customers by 2045.² Prometheus agrees that electrification is critical to reducing carbon emissions and reversing the catastrophic impacts California already has suffered from global warming.

¹ Executive Order N-79-020.

² <https://www.energy.ca.gov/sb100>.

Prometheus has reviewed the SB 100 Joint Agency Draft Report and notes from the Workshop. Both were dedicated exclusively to power generation. In the next phase of the Report, Prometheus believes the CEC, CPUC, and CARB have an opportunity to expand on the important role that transportation fuels will play in achieving the larger mission of SB 100. In particular, to bridge the gap between the liquid-fuels present and the electric future, policymakers cannot lose sight of innovations that deliver immediate health and environmental benefits to the state and its residents. Prometheus's fuel provides that bridge. Our fuel will be cost-competitive with petroleum gasoline and jet fuel. Our fuel requires no modifications to existing engines, has no blend limits, and burns cleaner than fossil fuels. Our fuel requires no new vehicle purchases. Thus, our fuel will be available to every community that utilizes transportation.

* * * *

Prometheus Fuels respectfully requests policymakers to consider that renewable fuels like ours do provide immediate, near- and, long-term carbon reductions, and that in many respects they are integral to the market success of carbon-neutral power generation and excess capacity storage. As such, when evaluated as a companion strategy to electrification as contemplated in policies such as SB 100 (and how those policies impact CARB's five-year Scoping Plan), our products can be part and parcel of the overall, shared mission to reduce climate change. We would welcome additional discussion with the team working on these important issues. Thank you for your continued efforts to address climate change and provide solutions, and for considering our comments.

Very truly yours,

Rob McGinnis, Ph.D.
Founder, CEO

www.prometheusfuels.com