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Climate Innovation Program - Global Clean Energy Comments

Please find Global Clean Energy's comments on the Climate Innovation Program attached. Thank you.

Additional submitted attachment is included below.



California Energy Commission
Docket Unit, MS-4
Docket No. 22-ERDD-02
715 P Street
Sacramento, California 95814

December 27, 2022

Dear Chairman Hochschild, Commissioners, and Docket Unit Members,

Thank you for the opportunity to comment on the Climate Innovation Program (Program), Docket No. 22-ERDD-02. Global Clean Energy is a California-based renewable fuels innovator that will produce ultra-low carbon renewable fuels from its patented nonfood camelina varieties. Our work is directly aligned with the goals of the Program to increase California's resiliency against climate change and to accelerate GHG reductions in a cost-efficient manner. As such, we believe renewable fuels technologies should be added to the list of eligible climate change technologies that are listed in the Program statute, and we urge the Energy Commission to take this action.

Background: Global Clean Energy Holdings and Camelina

Global Clean Energy is a uniquely positioned vertically integrated nonfood feedstocks and renewable fuels company focused on producing the least carbon intense renewable fuel possible without impacting food security or causing land use change. Global Clean Energy is one of the few energy transition businesses that is environmentally, socially, and economically sustainable. The company's headquarters and refinery are both located within the state (Torrance and Bakersfield), and we work with farmers throughout the United States to grow our patented varieties of camelina, which is the designed feedstock for our refinery.

Camelina is a short season, low water use crop with good nutrient utilization. These characteristics make it an ideal crop for several production systems, such as: 1) areas where growers might normally leave land fallow every other or every third year to conserve moisture and nutrients; and 2) areas that can introduce a short-season, overwinter crop that can be harvested sufficiently early to allow a major crop to be planted. Camelina is a perfect rotation crop to introduce into many of these cropping systems and is an ideal crop for making renewable diesel due to the low carbon intensity required to produce the crop.

Comments to Climate Innovation Program

As noted within the authorizing language for the Climate Innovation Program, the goal of the Program is to fund technological advancements that enable California to meet its GHG reduction goals at an accelerated pace while also becoming more resilient to climate change overall. Global Clean Energy's renewable fuels production operations are vertically integrated from farm to fuel, do not contribute to land use change, and provide multiple benefits to the biological environment – from capturing carbon in the soil where camelina is grown, to producing ultra-low carbon renewable fuels to power large scale machinery, equipment, and transportation. The end-product is a clean renewable fuel that serves as a drop-in replacement for petroleum-based diesel, meaning no new infrastructure or changes to diesel-powered vehicles will be required. Accordingly, the state can begin to reap climate change benefits and reduce GHG emissions immediately.

The transportation sector is the largest source of CO2 emissions in the country. The hardest segments to electrify – aviation, marine, and heavy-duty vehicles (including many used in California’s vibrant agriculture sector) – account for 37% of transportation energy use and are projected to grow considerably faster than other modes. While electrification may be one option for de-carbonization of the transportation industry, this rollout will likely occur on a small scale and will take considerable time and investment. Utilizing renewable diesel as an additional option will allow this industry to be able to continue operating at the same capacity without replacing entire fleets or paying for new infrastructure, while still achieving the GHG reductions necessary for California to meet its climate goals.

Additionally, renewable diesel and other renewable fuels produced with our proprietary camelina varieties have the potential to achieve a Net Zero (and even negative) carbon intensity (CI) score. Our ultra-low CI fuels also reduce NOx and particulate matter, a critical factor not only for the state’s climate goals, but also for many of the state’s disadvantaged communities living throughout the Central Valley and Inland Empire, where our renewable fuels refinery is located.

Conclusion

Global Clean Energy urges the Energy Commission to consider alternative feedstock fuels, such as camelina, when drafting the guidelines and grant requirements for the Climate Innovation Program. There is no single pathway forward to reducing our GHG emissions, and a variety of technologies should be embraced to ensure that the state reaches its goals and further mitigates the effects of climate change as expediently as possible.

Sincerely,

Amanda Parsons DeRosier
Vice President of Public Affairs and Investor Relations
Global Clean Energy | www.GCEHoldings.com
562-233-5146
Amanda.DeRosier@Gceholdings.com