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*Comment Received From: Peterson Power Systems
Submitted On: 10/23/2024
Docket Number: 21-RPS-02*

Peterson Power Systemsâ€™™ comments to the Proposed Scope for the Draft Renewables Portfolio Standard Eligibility Guidebook, Tenth

Additional submitted attachment is included below.



October 23, 2024

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

RE: Notice and Request for Comment on the Proposed Scope for the DRAFT *Renewables Portfolio Standard Eligibility Guidebook, Tenth Addition*

Dear Commissioners and Staff:

The California Energy Commission’s Renewable Portfolio Standard Eligibility Guidebook (“the Guidebook”) was formally adopted by the Energy Commission on April 21, 2004. Since its release and adaptation, it has been revised eight times and is currently in its ninth edition. It was last revised in January 2017.

Peterson Power Systems, a leading Caterpillar dealership headquartered in San Leandro, CA supports the CEC in revising the RPS handbook. Indeed, many advancements have been made since 2017. We believe that the proposed scope issued by the CEC on October 18th is comprehensive with the exception of the omission of Hydrotreated Vegetable Oil (“HVO” or “Renewable Diesel”) as a renewable fuel in Chapter 2. While the Guidebook briefly addresses Biodiesel in Chapter 2: Energy Resource Eligibility Requirements, the Guidebook fails to address HVO/Renewable Diesel.

HVO/Renewable diesel and [biodiesel](#) are not the same fuel. Renewable diesel, previously known as green diesel, is a hydrocarbon produced most often by hydrotreating and also via gasification, pyrolysis, and other biochemical and thermochemical technologies. It meets ASTM D975 specification for petroleum diesel. Biodiesel is a mono-alkyl ester produced via [transesterification](#). Biodiesel meets ASTM D6751 and is approved for blending with petroleum diesel.¹

HVO is 100% renewable and can be used in existing diesel engines without 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 emissions reductions.

¹ US Department of Energy – Alternative Fuels Data Center: <https://afdc.energy.gov/fuels/renewable-diesel>

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Due to a multitude of factors including reliability, performance, installed base, availability, and cost compared with other technology options, compression ignition engines (also known as diesel engine gensets) will remain the industry standard in underwriting the “insurance” necessary to maintain the electrical system and mitigate the potentially disastrous effects of utility outages at hospitals, wastewater treatment plants, police and fire stations and other critical societal infrastructure for many years to come.

As California continues to lead in the fight against climate change and the decarbonization of the energy sector, it is important that HVO be included in the Scope of the draft RPS Guidebook, Tenth Edition. Peterson appreciates the opportunity to submit these comments and we look forward to productive participation in this proceeding.

Respectfully,

A handwritten signature in blue ink, appearing to read "Greg Lamberg", written in a cursive style.

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

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