

## DOCKETED

<b>Docket Number:</b>	15-OIR-02
<b>Project Title:</b>	Modification of Alternative and Renewable Fuel and Vehicle Technology Program Funding Restrictions
<b>TN #:</b>	203792
<b>Document Title:</b>	Comments to the Modification to ARFVTP Funding Restrictions
<b>Description:</b>	N/A
<b>Filer:</b>	Kristopher Ballard
<b>Organization:</b>	CalRecycle
<b>Submitter Role:</b>	Public Agency
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## DEPARTMENT OF RESOURCES RECYCLING AND RECOVERY

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March 9, 2015

Lisa DeCarlo  
California Energy Commission  
Docket Unit  
Re: Docket No. 15-OIR-2  
1516 Ninth Street  
Sacramento, CA 95814-5512

Via Email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)**Subject:** Comments to the Modification to ARFVTP Funding Restrictions, Docket No. 15-OIR-2

Dear Ms. DeCarlo:

CalRecycle appreciates the opportunity to collaborate with the California Energy Commission (CEC) on the AB 118 program, which furthers our common interest in transitioning from a dependence on petroleum-based fuels to a reliance on sustainable low carbon fuels. We support the CEC's proposed modifications of existing regulations that will allow participants in the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) to receive the full value of emissions credits. This action will afford low carbon intensity fuel producers a crucial source of revenue to enable their projects to succeed.

The emergency rulemaking action for Title 20, California Code of Regulations, Section 3103 addresses important changes that will reduce financial barriers for California ARFVTP grant recipients who have voluntarily opted into the Low Carbon Fuel Standard (LCFS) program. The high cost of biofuel production in relation to the current, low price of fossil fuels has made LCFS credit sales critical to the economic viability of in-state biofuel facilities. We support CEC's efforts to modify Section 3103 in order to help biofuel producers compete economically with fossil fuels.

CalRecycle's interest in the modifications to the ARFVTP funding restrictions focuses on the development of biogas from facilities that divert organics from landfill, in accordance with the requirements of AB 341. By 2020, 75% of solid waste generated in California is to be reduced, recycled, or composted. Meeting the 75% recycling goal will increase the availability of pre-landfill organic waste feedstocks for biomethane production while resulting in significant greenhouse gas emission reductions.



If you have any questions, please do not hesitate to contact me directly at (916) 341-6311.

Sincerely,



Howard Levenson, Ph.D.

Deputy Director, Materials Management and Local Assistance Division

Member, Alternative and Renewable Fuel and Vehicle Technology Program

Investment Plan Advisory Committee

Cc: OAL Reference Attorney

Via Email: [staff@oal.ca.gov](mailto:staff@oal.ca.gov)