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ARFVTP: 3103 Regulation Response Form

1. What are the possible impacts for your project with the credit discount provision and the timeframe for when you expect to generate credits.

Since Calgren Renewable Fuels is a supplier of a low-carbon additive to gasoline and not a gasoline producer or importer, we question whether we are truly an obligated party under Section 3103. If we are forced to discount the value of the low-carbon attributes we produce, we will be penalized for achieving the objectives of the LCFS. Correspondingly, our customers, who are gasoline producers and importers, will be unjustly rewarded. It will be as if the grant was extended to our customers and not to us.

2. We would also like to provide you the opportunity to provide a statement for our record.

Calgren Renewable Fuels urges the CEC to confirm that Section 3103 does not apply to Calgren and similar entities, particularly as it relates to PON-13-609.