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Docket Number:	15-OIR-02
Project Title:	Modification of Alternative and Renewable Fuel and Vehicle Technology Program Funding Restrictions
TN #:	204705-24
Document Title:	Whole Energy's Response to 3103 Regulation Questions
Description:	N/A
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Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	5/22/2015 3:59:31 PM
Docketed Date:	5/22/2015

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.

We do not envision any impacts to our facilities as the funding received from the CEC has been used for infrastructure. However, we do believe that biodiesel producers in the State may be negatively impacted like Crimson Renewable Energy, Community Fuels, and New Leaf Biofuels.

These biodiesel producers may either not be aware of the credit provisions as they apply to RINs and to LCFS credits.

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

Typically the incentives like LCFS credits and RINs are only partially realized by the biodiesel producer. It is difficult to compete on pricing if the biodiesel producer does not somehow pass most of the value on to their customers.

For this reason, it may be wise to phase out this provision for future funding and also work out flexible repayment of credit revenues for projects that are under way or have been undertaken by producers.