

## DOCKETED

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<b>Project Title:</b>	Modification of Alternative and Renewable Fuel and Vehicle Technology Program Funding Restrictions
<b>TN #:</b>	204705-7
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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.

Reg 3103 appears to only apply to “credits generated by the project during the term of the agreement,” and for the transfer of those credits up to three years after the term of the agreement. Since there were no credits generated by this project during the term of our agreement with the CEC, Reg 3103 discounting provisions are not applicable.

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

Even though Reg 3103 is not applicable to our grant, it seems to be counterproductive to incentivizing the production of low carbon intensity biofuel under the LCFS. LCFS has been hampered by litigation and the value of credits has been diminished. The re-adoption and rescheduling of the compliance curve is unlikely to occur before 2016. To stimulate the production of low carbon intensity biofuel Reg 3103 should be repealed ASAP.