

DOCKETED

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Comment Received From: Joe Gershen

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Scoping Order for the 2017 Integrated Energy Policy Report California Biodiesel Alliance Comments

Additional submitted attachment is included below.



California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

January 25, 2017

Re: Docket No. 17-IEPR-01 – **Scoping Order for the 2017 Integrated Energy Policy Report**
California Biodiesel Alliance Comments

Dear Commissioners and Staff,

I am writing on behalf of the California Biodiesel Alliance (CBA), California's not-for-profit biodiesel industry trade association, representing over 40 businesses and stakeholders. CBA is very concerned that we see no mention of biodiesel or any biofuels, for that matter, in this document. It appears that the only focus is on zero emission vehicles and technologies (ZEV) and electrification of the transportation sector.

In the Scoping order, the Commission states that “California is well on its way to meeting the 2020 target, but the 40% reduction target by 2030 is much more ambitious.” We agree and we appreciate California must continue to aim high to achieve these aggressive targets. However, we believe the Commission is doing itself a disservice by not recognizing (and taking credit for) the renewable fuels that are currently making the LCFS program a success. The 2016 data released from California Air Resources Board shows that ethanol, biodiesel and renewable diesel generated about 85% of the LCFS credits in the program, while electricity generated only 3%. It follows that biofuels are responsible for the overwhelming contribution to GHG reduction in the transportation sector to date. And this will continue to be true well in to the next decade. The State should remain committed to an “all of the above” petroleum displacement strategy in order to keep all of the renewable fuel technologies invested in the program’s future. Further, by omitting biofuels in this Scoping Order, the whole program is left open to “pie in the sky” type criticism from those who would like to see it fail.

As always, we do value the open dialog and relationship that our industry has developed with the Energy Commission and look forward to continuing to communicate with staff. We appreciate the opportunity to provide feedback to this Draft 2017 IEPR.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joe Gershen", written over a light gray rectangular background.

Joe Gershen
Vice-President, California Biodiesel Alliance