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Docket No. 17-IEPR-05 - Transportation Energy Demand Forecast

Additional submitted attachment is included below.



California Energy Commission 1516 Ninth Street Sacramento, CA 95814-5512 August 7, 2017

Re: Docket No. 17-IEPR-05 - Transportation Energy Demand Forecast

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 a broad range of stakeholders, including all of the state's major biodiesel producers.

We would like to let commissioners and staff know that on July 20 CARB announced that it had certified a unique biodiesel NOx mitigation additive - VESTA™ 1000 - that will make possible the expanded use of biodiesel in California up to B20 blends in compliance with the ADF regulation. CBA feels this is very important information for the energy commission to be aware of, as it will impact policy going forward. The biodiesel industry believes that there will be other additives also made available to the market.

CBA feels that investments should be focused on storage and blending infrastructure. Now that blend levels up to B20 will not be an issue, the primary barriers to increased blending will be at the bulk fuel terminals and racks. There will also be some infrastructural costs associated with storage and blending of the new NOx mitigation additive that will benefit from modest investments by the state.

Additionally, We encourage the Energy Commission to expand funding for research and development of purpose grown energy crops for use as low carbon biofuels feedstocks.

CBA also stresses the importance of equitable vetting of all participants in the LCFS value chain, with even stricter standards applied to foreign biodiesel and renewable diesel participants. Proper pathway verification and follow up of all program participants is crucial to success of the LCFS.

We 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 hope this will lead to even more meaningful funding allocations for the biodiesel industry in the near future.

Respectfully submitted,

Joe Gershen Vice President

California Biodiesel Alliance