

## DOCKETED

<b>Docket Number:</b>	18-MISC-01
<b>Project Title:</b>	Food Production Investment Program
<b>TN #:</b>	223104
<b>Document Title:</b>	Philip Gleckman Comments The measure of disruption
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Philip Gleckman
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	3/30/2018 5:33:30 PM
<b>Docketed Date:</b>	4/2/2018

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*Submitted On: 3/30/2018*

*Docket Number: 18-MISC-01*

## **The measure of disruption**

The following statement appears in the Food Production Investment Program DRAFT Guidelines: "The focus of Tier II is to fund and demonstrate disruptive cutting edge technologies that provide significant (e.g., greater than 5% facility-wide) GHG emission reductions that are necessary to accelerate the food processing industry into a low carbon future." Using any percentage GHG reduction per FPIP project as the measure of disruption creates a disadvantage for those facilities with substantially larger GHG emissions since the capital required for the reduction will be larger relative to facilities with lower emissions while the maximum award amount is indifferent to the site's emissions. Preference could be given for projects with the greatest number of avoided tons of CO<sub>2</sub>. An alternative measure of disruptive impact would consider the potential of the technology to deliver the largest CO<sub>2</sub> reductions for the industry beyond the FPIP program.