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Proposed 2020 IEPR Update Liquid Fuels Chapter

Part 1 of 2

Additional submitted attachment is included below.

From: Tom Fulks
To: Energy - Docket Optical System
Subject: 20-IEPR-02 Low-Carbon Fuels Proposed Liquid Fuels Chapter (Cover Letter)
Date: Tuesday, July 28, 2020 1:57:21 PM
Attachments: image002.png

Tuesday, July 28, 2020

Re: Proposed 2020 IEPR Update Liquid Fuels Chapter

To whom it may concern,

On behalf of Neste, Oberon Fuels and Prometheus Fuels, we have submitted to the docket under separate cover a draft chapter on low-carbon liquid fuels for inclusion in the 2020 Update of the Integrated Energy Policy Report. We submit this document to the California Energy Commission in advance of its July 29 workshop on Near-Zero Emissions and Low-Carbon Fuels.

We believe inclusion of this chapter, or a variation of it generated by the CEC staff in consultation with key stakeholders, would provide a balanced and practical outlook of California's transportation energy landscape. This chapter will help California implement its stated "all-of-the-above" strategy to meet its greenhouse gas and criteria pollutant reduction goals.

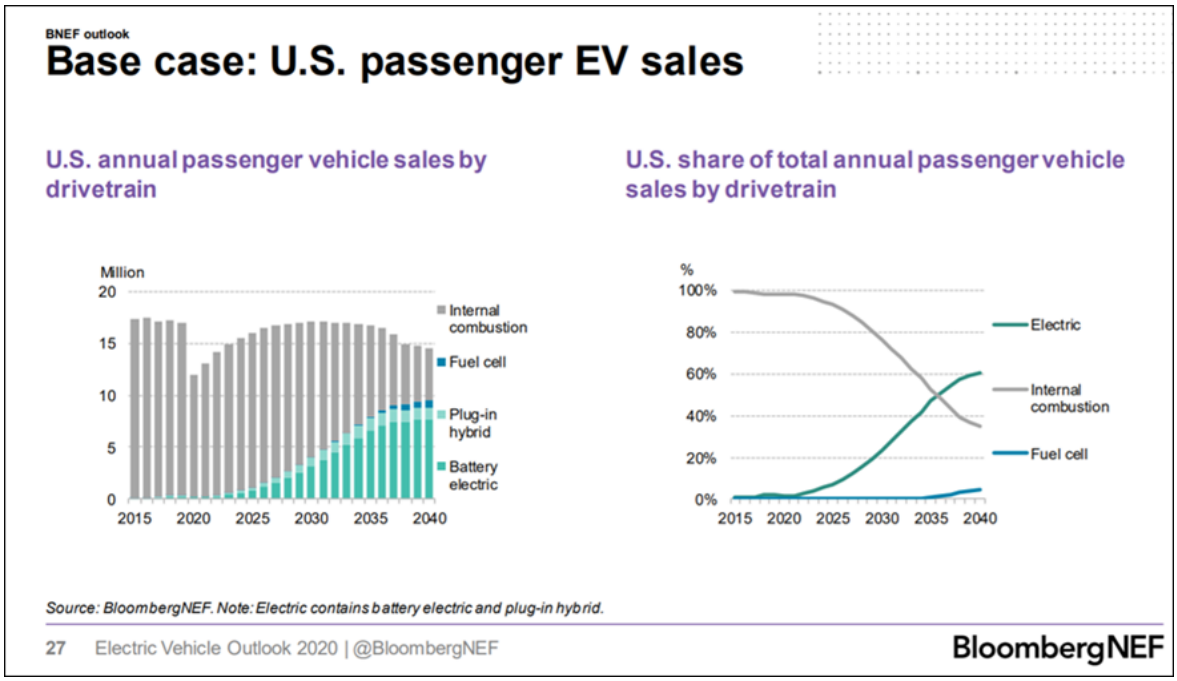
The industry stakeholders we represent include makers of renewable diesel fuel and renewable jet fuel, renewable dimethyl ether (DME – a key ingredient to more widespread production of renewable hydrogen fuel and renewable propane road fuel), and direct-air-capture production of carbon-neutral, renewable gasoline and other transportation fuels.

Non-battery electric vehicles will continue to ply California's roadways for many decades, especially in the heavy-duty freight sector. We thus believe including these fuels in the IEPR update recognizes the in-use transportation fuels outlook as the state's electric drive policies are being implemented and the state transitions to ubiquitous zero-emission vehicle use.

To that end, we believe that continuing to use a portion of funding from the CEC's AB 118 Clean Transportation Program dedicated to investments in advanced low-carbon fuel innovation, development and deployment remains as important as ever.

We understand the desire to move more aggressively toward an electric-drive future. That said, we strongly encourage the state (in general) and the CEC (in particular) to recognize the transition time inherent in fulfillling these policy goals while internal combustion engine technology is phased out.

As reported at the CEC's June 11 IEPR update workshop, "Transportation Trends and Light-Duty Zero-Emission Vehicle Market Update," Bloomberg New Energy Finance specialist Nick Albanese forecast ICE powertrain technologies will continue to constitute a significant portion of the passenger vehicle market by 2040. This doesn't account for the heavy-duty vehicle segment, which experts believe will continue to rely on ICE technology well into that future.



Another good reason a liquid fuels chapter is needed in the IEPR update is to simply acknowledge what's been pointed out about the long-term need for liquid fuels at the CEC's own IEPR update public workshops. We'd suggest the CEC recognize these fuels as vital to the long-term vehicle fleet mix reality, and that the carbon-reduction benefits of these fuels take their place alongside zero-emission technology.

Thank you for your time and consideration. We look forward to a robust discussion about this at the July 29 IEPR update workshop.

Very truly yours,

s/ Tom Fulks, President
Mightycomm
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