

DOCKETED

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*Comment Received From: Allen Schaeffer
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Executive Director

Additional submitted attachment is included below.

October 31 2024

Via EMAIL DELIVERY

California Energy Commission
Docket Unit, MS-4
Docket No. 21-RPS-02
715 P Street
Sacramento, CA 95814

In Re: DOCKET NO. 21-RPS-02 “Renewables Portfolio Standard 10th Edition Guidebook Update; Notice and Request for Comment on Proposed Scope for the RPBS GB 10th Edition

Dear Commissioners and CEC Staff,

We are writing in regard to the above captioned request for comment on the proposed scope for the Renewables Portfolio Standard Guidebook, (“Guidebook”).

The Engine Technology Forum, Inc. (“ETF”) is a not-for-profit educational association that represents manufacturers of internal combustion engines, vehicles, and equipment including mobile and stationary generators, along with component manufacturers and renewable and petroleum fuel producers. ETF collects and commissions research that attests to the environmental and economic importance of engine technology and serves to advocate these benefits broadly. More information including a list of members is available at www.enginetechforum.org.

Our comments below are focused on the Guidebook’s references to the use of biofuels for generation of electricity.

I. The Guidebook’s Current Treatment of Biodiesel: Chapter 2, Energy Resource Eligibility Requirements

For reference, the Guidebook’s current reference to biodiesel and related biomass is captured below:

A. Biodiesel A facility may qualify for RPS certification if it generates electricity using biodiesel derived from biomass feedstock or from an eligible solid waste conversion process using municipal solid waste. When applying for RPS certification, the applicant must submit

information on the feedstock used to produce the biodiesel. For energy resource requirements, see Chapter 2.B Biomass, 2.C: Biomethane, or 2.G.2: MSW Conversion.

B. Biomass A facility may qualify for RPS certification if it generates electricity using biomass fuel. When applying for RPS certification of a facility using biomass, the applicant must submit information on the type and source of the biomass used, or planned to be used, at the facility. If the facility is using fuel that results from “biomass conversion” as defined in Public Resources Code Section 40106, documentation must be submitted to confirm the fuel was produced through a process that meets the definition of “biomass conversion” and satisfies the requirements of Public Resources Code Section 44107.

II. Chapter 2 of The Scope Of The Guidebook Should Be Updated To Incorporate Hydrotreated Vegetable Oil (HVO)

A significant deficiency in the current Guidebook scope is that it is lacking appropriate recognition of Hydrotreated Vegetable Oil (“HVO”), also known as Renewable Diesel (RD) as a distinct qualifying renewable fuel in Chapter 2.

While it can be produced using the same feedstocks as biodiesel, the chemical process to produce Hydrotreated Vegetable Oil (HVO) is different and results in a far different fuel than biodiesel, which warrants its own specific and separate energy resource listing in the Guidebook.

HVO can be used in all existing diesel engines up to 100 percent without modification and is compatible with existing diesel infrastructure. HVO meets California Air Resource Board (CARB) motor vehicle fuel specifications under Title 13, California Code of Regulations (CCR), section 2281 et seq., and meets the aromatic, sulfur, and lubricity standards, of ASTM specification D975-12a.1.

As a “drop in” alternative to diesel fuel, HVO provides significant carbon reductions when compared to diesel fuel or lesser blends of biodiesel, and as such has a potentially significant role to play in the decarbonization of California’s Electrical grid.

HVO’s benefits are already being realized by the transportation sector as a means of sector decarbonization as part of the Low Carbon Fuel standard administered by the California Air Resources Board (CARB). In the most current edition of the Low Carbon Fuels Data Dashboard, (April 30, 2024), [Figure 2](#), (see Exhibit 1), Renewable Diesel fuel is the largest generator of renewable fuel credits and the largest low carbon fuel by volume of all low carbon eligible fuels in 2023.

Both the California Public Utilities Commission (CPUC) and CEC have acknowledged the benefits of HVO. The CPUC, in regulating PG&E’s temporary generation program to combat Public Safety Power Shutoffs (PSPS), has encouraged the maximization of the use of HVO in liquid fueled temporary

generation installations. Similarly, the CEC's division staff has encouraged the use of HVO as a fuel of choice in the data center applications before the Commission.

Manufacturers of reciprocating internal combustion engines used in power generation settings have all endorsed the use of HVO in their products. Back-up power system users are increasingly exploring ways to reduce their carbon intensity. Choosing to utilize renewable HVO in their units is a strategy we anticipate increasing in the coming years.

Summary

California's ambitious climate goals demand a full range of solutions of fuels and technologies that are able to reduce carbon emissions. HVO/RD is one of those solutions and should be included in the Guidebook. Considering the sheer size of the diesel generation fleet in California, including HVO/RD ensures that those utilizing diesel technologies will strive to maximize the use of renewable fuels, which has the potential for a significant reduction in greenhouse gas emissions from the energy sector.

Thank you for considering these comments, and we are happy to respond to any questions.

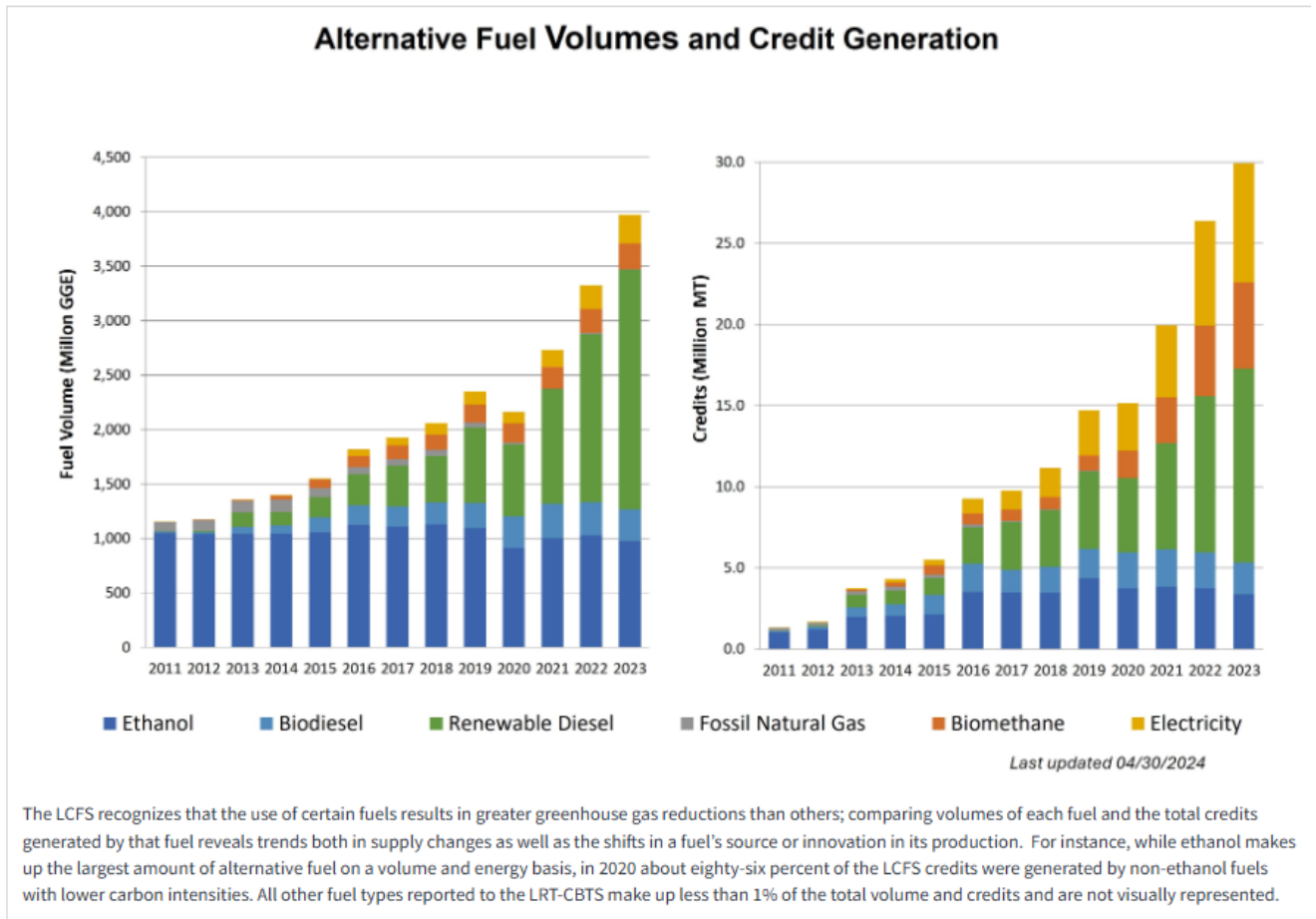
Sincerely yours,



Allen Schaeffer
Executive Director

Attachment: Exhibit 1: Figure 2 from the CARB LCFS Data Dashboard, Accessed October 22, 2024

EXHIBIT 1



<https://ww2.arb.ca.gov/resources/documents/lcfs-data-dashboard>