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DOCKET	
06-AFP-1	
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Docket number 06-AFP-1
Alternative Fuels Transportation Plan

Commissioners Boyd and Byron,

I respectfully request that the following topic be included for discussion at the Alternative Fuels Transportation Plan workshop:

Primafuel is heavily investing in the biofuels infrastructure and next-generation technologies required to meet California's aggressive GHG reduction goals. As such, the framework by which existing and emerging biofuels feedstock and conversion technologies are evaluated is critical. While the technicalities of life-cycle modeling are critical, sound-science is sound science. The particulars of land-use and other impacts of certain fuel pathways can and will be determined and debates between GREET vs. Modified GREET vs. LEM (etc.) will be resolved.

The most important issue is one of policy: How can a company developing new technologies be assured that unknown costs and unpredictable delays of 3rd party (governmental or otherwise) verification of a new fuel pathway will not hamper investment or commercialization? Self-certification with a certified modeling tool seems to be a default position on this topic, but the importance of this subject merits further discussion. For example, given the bottlenecks which currently exist in verifying emission-reduction technologies, what structural changes at the regulatory level may be required to meet AB 1007's objectives?

Best regards,

A handwritten signature in black ink, appearing to read "Rahul Iyer", written over a circular, textured grey stamp.

Rahul Iyer
Executive Vice President
Primafuel, Inc.