



Re: **08-ALT-1 AB118 Regulations**

BioFuelBox Inc. applauds the Energy Commission for articulating such forward-thinking Sustainability Goals. As a California based clean energy startup company producing biodiesel from waste streams, we are committed to sustainability as the core of our business. Our mission is to remove environmentally damaging waste streams from California's ecosystems while simultaneously producing green, non-petroleum based biodiesel. The waste streams we process include brown or waste trap grease, as well as dissolved air flotation skimmings from the wastewater treatment process. Our system is closed loop, meaning our processing facilities do not add to the waste streams in California's environment. The biodiesel produced by our environmentally efficient process meets ASTM D6751 specifications.

From this standpoint, we would like to express our concern about the burden that stringent reporting requirements would place on emerging technologies. We appreciate that larger companies may be able to hire someone exclusively tasked with sustainability reporting, but for a young company with a leading edge technology, such requirements are a very taxing burden on the team's resources. We see that preventing undue burden on emerging technologies is a staff goal for the AB118 Sustainability Program, and we wholeheartedly support this goal.

From a statutory perspective, we understand that CEQA reporting will likely be required in order to site a fuels processing facility. We wonder, however, if financial support might be provided for fulfilling these requirements, especially to the extent that third-party certification is required.

With respect to the other recommended sustainability frameworks, we would like to point to the small supplier exemption from annual and monthly reporting for the January 2008 proposed sustainability requirements of the UK's Renewable Transport Fuel Obligation. Such exemptions recognize that reporting places a significantly larger burden on emerging technologies. These requirements particularly impact small companies insofar as they require reporting at high frequencies.

Again, as a sustainable biodiesel company, we wholeheartedly support the sustainability goals articulated by the Commission. We also support the Commission's concern about the impact reporting requirements may have on the development of young companies with emerging technologies, and hope that the Commission will take our additional comments into consideration prior to finalizing the AB118 rules and regulations.

We thank the members of the Commission for their attention.