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<b>Filer:</b>	Raquel Kravitz
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# PROMETHEUS

January 20, 2021

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814  
Docket No.: 20-IEPR-02  
Submitted via email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

**Subject:** Prometheus Fuels comments regarding the Draft 2020 IEPR Update

Dear Commissioners:

Thank you for the opportunity to comment on the Draft 2020 Integrated Energy Policy Report Update (the Draft). Prometheus Fuels supports this update as an important step toward addressing California's energy needs and future policy paths, and we appreciate the Commission's work in preparing it. Below, we share some observations about the Draft and where the Commission can recognize the important role that carbon-neutral liquid fuels will have in achieving California's policy goals for climate change over the next 15 years and beyond.

## Background

Prometheus is a California-based company that removes carbon dioxide (CO<sub>2</sub>) from the air and turns it into drop-in, zero-net-carbon CARB gasoline, diesel, jet fuel and hydrogen that are 100 percent carbon neutral. The only inputs to this process are air and electricity from solar and wind power, and the only outputs are fuel and oxygen. Our fuel will be cost-competitive with petroleum gasoline and jet fuel. Our fuel requires no modifications to existing engines, has no blend limits, and burns cleaner than fossil fuels. Our fuel requires no new vehicle purchases. Thus, our fuel will be available to every community that utilizes transportation.

Our fuels are designed to have an immediate impact on climate change. Every gallon of Prometheus fuel used on the road or in the air leaves a gallon of fossil fuel in the ground. In other words, replacing all transportation fuels that are now made from petroleum with zero-net-carbon fuels made from renewable electricity can reduce global emissions by more than 10 gigatons of CO<sub>2</sub> per year, equivalent to approximately 25% of current annual global emissions.

## Discussion

Prometheus understands that California's policy focus is on electrification. We agree that electrification is essential to reducing carbon emissions and reversing the catastrophic impacts that are already being experienced within the state and elsewhere due to global warming. Yet, we also believe that it is crucial for policymakers to understand that renewable fuels like ours provide immediate near- and long-term carbon reductions. Our products can make a critical contribution to the overall, shared mission to slow and reduce the impacts of climate change.

We believe that the Commission has the opportunity in the next draft to recognize that technology such as ours supports this shared mission. The Draft even acknowledges this point when it writes “the state must ensure access to clean mobility options to ensure low-income and disadvantaged communities benefit from this transition,”<sup>1</sup> as well as “some transportation modes may be difficult to electrify.”<sup>2</sup> The next draft can further support these statements by recognizing carbon-neutral fuels as a clear transition path for low-income and disadvantaged communities, as well as a solution for transportation modes that are difficult to electrify.

In particular, the Draft’s liquid fuels chapter recommends that the state prioritize low-carbon liquid fuels for sectors that are hardest to electrify because “[t]hese fuels also have the potential for reducing greenhouse gas and criteria pollutant emissions from diesel engines in the existing vehicle fleet as the state transitions to zero-emission vehicles.”<sup>3</sup> We believe this recommendation should apply to all sectors, not just those that are hardest to electrify. According to the U.S. Department of Transportation, the lifespan of passenger vehicles is getting longer, with the average car spending nearly 12 years on the road as of 2019.<sup>4</sup> In addition, as reported at the Commission’s June 11, 2020 workshop, internal combustion engine (ICE) technologies will continue to occupy a significant portion of the passenger vehicle market through 2040.<sup>5</sup> Given this longevity of ICEs, the Commission’s continued use of its AB 118 Clean Transportation Program – dedicated to investments in advanced low-carbon fuel innovation, development, and deployment – remains as important as ever.

\* \* \* \*

To bridge the gap between the liquid-fuels present and the electric future, policymakers cannot afford to lose sight of innovations that deliver immediate health, economic, and environmental benefits to the state and its residents. Prometheus’s fuel provides that bridge. Prometheus reiterates its appreciation for the Commission’s work in preparing the 2020 IEPR Update. We would welcome additional discussion with the team working on these important issues. Thank you for your consideration.

Sincerely,

Rob McGinnis, PhD  
Founder, CEO  
[prometheusfuels.com](http://prometheusfuels.com)

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<sup>1</sup> *Draft 2020 Integrated Energy Policy Report Update Volume I: Blue Skies, Clean Transportation*, at 2.  
<sup>2</sup> *Draft 2020 Integrated Energy Policy Report Update Volume I: Blue Skies, Clean Transportation*, at 10.  
<sup>3</sup> *Draft 2020 Integrated Energy Policy Report Update Volume I: Blue Skies, Clean Transportation*, at 137.  
<sup>4</sup> <https://www.bts.gov/content/average-age-automobiles-and-trucks-operation-united-states>.  
<sup>5</sup> <https://efiling.energy.ca.gov/getdocument.aspx?tn=233410>, at slide 27.