



California Air Resources Board
Transportation Fuels Branch, Industrial Strategies Division
Sacramento, CA 95812

RE: Life Cycle Associates Comment, Application T2N-1202

To whom it may concern,

We appreciate the feedback from Life Cycle Associates and are happy to provide more detail. REG does not self-collect UCO, this pathway is applicable to an aggregator whose primary business is to provide fresh oil to quick service restaurants. As a secondary service, the aggregator also collects waste oil through a proprietary collection system. The aggregator is always delivering fresh oil while collecting the waste oil. They do not provide a dedicated collection service.

When calculating a 'rendering oil' transportation distance for the purposes of the GREET Model REG applies a weighted average calculation based on the information contained on each Bill of Lading (BOL). The BOL contains the amount of oil delivered and the mode it was transported by.

We agree with Life Cycle Associates that it would have been proper to set the feedstock grid location to that of the biodiesel plant, however no electricity is consumed on the feedstock portion of the calculator. Therefore it would not affect the pathway carbon intensity.

Regards,

A handwritten signature in blue ink, appearing to read "Matt Herman", is written over a light blue grid background.

Matt Herman
Team Leader, Environmental Compliance and Services