

## **Comment 1 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Ivan

Last Name: Jimenez

Email Address: ivan@brightlinedefense.org

Affiliation: Brightline Defense

Subject: Brightline Comment on Proposed Amendments to LCFS

Comment:

Please see the attached file for Brightline Defense's comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/1-lcfs18-VjQGcgNrAjZQPgh8.pdf>'

Original File Name: BrightlineCommentsLowCarbonFuelStandard.pdf

Date and Time Comment Was Submitted: 2018-03-16 14:33:33

No Duplicates.

## **Comment 2 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Stephen  
Last Name: Jones  
Email Address: sj@itm-power.com  
Affiliation: ITM Power

Subject: Re: Lcfs reporting

Comment:

Hello Anthy,  
Im in the process of putting an info pack together for review for our station.  
In the meantime I was reviewing the LCFS document at <https://www.arb.ca.gov/regact/2018/lcfs18/appa.pdf> and had a question.

On p 167 it says:

Any fuel pathway holder, including a joint applicant, who is not subject to site visits by a third party verifier, whose pathway involves the use of renewable or low-CI process energy, must submit invoices for that energy to the AFP. Additionally, for any electricity that is used to reduce carbon intensity of electricity for EV charging or hydrogen production via electrolysis, the pathway holder must upload records demonstrating that any RECs generated were retired in WREGIS for the purpose of LCFS credit generation.

This section appears to be existing pathway holders, which we are not, however it does seem to hint that reducing the CI of electricity is possible by retiring RECs in WREGIS. Is this limited to on-site/co-located renewable energy production?

Thanks

Steve Jones  
ITM Power  
+1 (714) 453 8141

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-03-20 09:21:54

No Duplicates.

## **Comment 3 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mark  
Last Name: Heisler  
Email Address: [Mark@energyfieldsolar.com](mailto:Mark@energyfieldsolar.com)  
Affiliation: EnergyField Solar, Inc.

Subject: Innovative Crude Comments

Comment:

Dear Sam Wade,

Please find our comments in the letter attached.

Best Regards,

Mark Heisler  
CEO & Co-Founder  
EnergyField Solar, Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-lcfs18-VztcOVw7UHADWIQ3.pdf>'

Original File Name: LCFS Comment Letter v2.pdf

Date and Time Comment Was Submitted: 2018-03-20 20:33:54

No Duplicates.

## **Comment 4 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: ex-commercial banker

Last Name: concerned taxpayer

Email Address: cecore@aol.com

Affiliation:

Subject: Attn: Anil Prabhu - Public Comments on Tier 2 Fuel Pathway Applications

Comment:

Anil: Left you a phone message to discuss but never heard back from you. As an ex-banker for 25 years who financed biodiesel plants you may want to do due a lot diligence on the biodiesel companies on your list. Banks have had problems in the past financing biodiesel plants. (Co-bank as an example) In my opinion with RIMS abuse and fraud and RFS in disarray I caution your involvement. I have watched many US biodiesel plants go into bankruptcy and liquidated over the last 10 years. Biodiesel plants (even the biggest 10 years later) have continued to lose money. You can't build a business all based on a tax-credit. It was a flawed plan.

You may want to re-think your plan.

I am not a fan of Big Oil but you may want to consider what Exxon is doing with algae biofuels. Algae is renewable, has no affect on the food channel (like biodiesel) and consumes CO2.

Thank You,

An ex-commercial banker for 25 years and concerned taxpayer.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-03-26 08:36:36

No Duplicates.

## **Comment 5 for LCFS 2018 (lcfs18) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 6 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Lauren

Last Name: Taylor

Email Address: lauren.taylor@erisolutions.com

Affiliation: ERI Solutions Inc

Subject: LCFS Questions

Comment:

Please see attached comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-lcfs18-WjlROFQ4BzlVNgVr.pdf>'

Original File Name: Comment for Lauren Taylor - ERI Solutions Inc.pdf

Date and Time Comment Was Submitted: 2018-03-30 10:27:35

No Duplicates.

## **Comment 7 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Gary

Last Name: Dannar

Email Address: gdannar@dannar.us.com

Affiliation: DD Dannar, LLC

Subject: Comments on Proposed LCFS Amendments

Comment:

See attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-lcfs18-BWEBZIY5Az4FYgZ0.pdf>'

Original File Name: DANNAR Comment Letter for LCFS FINAL (4-04-18).pdf

Date and Time Comment Was Submitted: 2018-04-06 09:05:02

No Duplicates.

## **Comment 8 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Love

Last Name: Goyal

Email Address: [goyal@lifecycleassociates.com](mailto:goyal@lifecycleassociates.com)

Affiliation: Life Cycle Associates, LLC

Subject: Comments on Starch ethanol calculator

Comment:

Please refer to the file "LCA\_-\_Starch\_Calculator\_Memo\_CO\_BioC\_v1.pdf" in the attached archive for our comments. The additional files in the archive are provided as attachment for the comments file.

Thank you for your consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-lcfs18-AW1VMFMzAAwDaQdk.zip>'

Original File Name: LCA LCFS Comments.zip

Date and Time Comment Was Submitted: 2018-04-06 18:15:15

No Duplicates.

## **Comment 9 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Patrick

Last Name: McDuff

Email Address: pat@californiafueling.com

Affiliation:

Subject: 2018 LCFS Rulemaking Comments

Comment:

Please see the attached document for detailed subject comments.  
Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-lcfs18-VDgHYIUyWHgEXVAi.pdf>'

Original File Name: LCFS RULEMAKING COMMENTS 04.09.18.pdf

Date and Time Comment Was Submitted: 2018-04-09 16:35:01

No Duplicates.

## **Comment 10 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Victoria

Last Name: Bermudez

Email Address: bermudezvf@gmail.com

Affiliation: Victoria Bermudez RN, Consultant

Subject: Public Health Support for Stronger LCFS Target

Comment:

Please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-lcfs18-UyBdLIIjBCcBaAd1.pdf>

Original File Name: Support LCFS Target VB.pdf

Date and Time Comment Was Submitted: 2018-04-10 09:54:16

No Duplicates.

## **Comment 11 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kirsten

Last Name: James

Email Address: james@ceres.org

Affiliation:

Subject: BICEP Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Hello,

Please find attached BICEP's (Business for Innovative Climate and Energy Policy) comments on Proposed Amendments to the Low Carbon Fuel Standard.

Best,  
Kirsten James

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/13-lcfs18-AGJRPIwUWdQJgNc.pdf>'

Original File Name: BICEP\_LCFS Amendments\_April 12 2018\_Final.pdf

Date and Time Comment Was Submitted: 2018-04-12 15:16:41

No Duplicates.

**Comment 12 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Andrew

Last Name: Mayer

Email Address: amayer@winston.com

Affiliation:

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-lcfs18-ATNRZ1RkVD9WfgU1.pdf>'

Original File Name: 2018.04.09 BART Comments re Proposed Changes to LCFS Regulation.pdf

Date and Time Comment Was Submitted: 2018-04-12 15:39:11

No Duplicates.

## **Comment 13 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jane

Last Name: Hirshfield

Email Address: [jhpac@pacbell.net](mailto:jhpac@pacbell.net)

Affiliation:

Subject: Extend LCFS to 2030

Comment:

As a member of the public with a vested interest in a viable planet, I applaud California's leadership in setting fuel standard goals that will bring us, if possible, back from the precipice of climate-change tipping point.

I ask the Board to do everything within their power to lower emissions, increase efficiency, and preserve/restore the best possible air quality for California, the country, and the planet.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-13 16:29:04

No Duplicates.

**Comment 14 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Susan

Last Name: Hovorka

Email Address: Non-web submitted comment

Affiliation: Gulf Coast Carbon Center

Subject: CCS protocol under the LCFS

Comment:

See attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-lcfs18-UTIVPAB3V2sDdwBr.pdf>'

Original File Name: Hovorka comments 4-14-18.pdf

Date and Time Comment Was Submitted: 2018-04-16 09:15:01

No Duplicates.

## **Comment 15 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Janelle

Last Name: London

Email Address: [janelle@coltura.org](mailto:janelle@coltura.org)

Affiliation: Coltura

Subject: Comments on LCFS from Coltura

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-lcfs18-WmtTbVZnA2RQZwI0.pdf>'

Original File Name: 180416 Coltura LCFS Sign On Letter.pdf

Date and Time Comment Was Submitted: 2018-04-16 10:36:10

No Duplicates.

## **Comment 16 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Nina

Last Name: Kapoor

Email Address: nina@rngcoalition.com

Affiliation: Coalition for Renewable Natural Gas

Subject: RNG Coalition's Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Please find attached RNG Coalition's Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-lcfs18-VyVQOFQyAzNSCwlq.pdf>'

Original File Name: RNGC Comments 2018 LCFS Proposed Amendments 041618 .pdf

Date and Time Comment Was Submitted: 2018-04-16 14:09:45

No Duplicates.

## **Comment 17 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mary  
Last Name: Solecki  
Email Address: msolecki@ajw-inc.com  
Affiliation: AJW, Inc

Subject: IOGEN and AJW Comments for 2018 LCFS ISOR

Comment:

Dear ARB,

Attached please find AJW and IOGEN's comments about the current rulemaking and proposal for an LCFS program through 2030.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-lcfs18-UGFVa1RlAGdRZlNl.pdf>'

Original File Name: 180416 LCFS letter Iogen AJW.pdf

Date and Time Comment Was Submitted: 2018-04-16 17:29:03

No Duplicates.

## **Comment 18 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Dan

Last Name: Smading

Email Address: dan.smading@fhr.com

Affiliation: Flint Hills Resources

Subject: FHR Comments to Proposed LCFS & ADF Amendments

Comment:

Attached please find Flint Hills Resources' comments to the proposed amendments to the LCFS and ADF regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-lcfs18-W2lcalBgB2xWYAcz.pdf>'

Original File Name: 20180417 FHR Comments to Proposed LCFS and ADF Amendments.pdf

Date and Time Comment Was Submitted: 2018-04-17 12:26:18

No Duplicates.

## **Comment 19 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Rachel

Last Name: Bird

Email Address: [rbird@borregosolar.com](mailto:rbird@borregosolar.com)

Affiliation: Borrego Solar Systems, Inc.

Subject: Comments on the 2018 Amendments to the Low Carbon Fuel Standard Program

Comment:

Please see attachment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-lcfs18-BjQCNFVIBG9Vfldn.pdf>'

Original File Name: 2018-04-16\_Borrego Comments on 2018 Amendments to LCFS Program\_CARB.pdf

Date and Time Comment Was Submitted: 2018-04-17 17:28:51

No Duplicates.

**Comment 20 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Nitin

Last Name: Natesan

Email Address: nitin.natesan@linde.com

Affiliation:

Subject: LCFS ISOR Docket Submittal

Comment:

LCFS ISOR Docket Comment Submittal

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-lcfs18-Uj5cOVcwUnJRCFI7.pdf>'

Original File Name: LCFS ISOR LETTER (4-18-18).pdf

Date and Time Comment Was Submitted: 2018-04-18 12:48:55

No Duplicates.

## **Comment 21 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation:

Subject: WSPA Comment Letter - LCFS

Comment:

WSPA Comment Letter on RICP and Buffer Account Elements of Proposed LCFS Regulation Amendments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-lcfs18-UyRcKQNyAjBRCArn.pdf>'

Original File Name: WSPA Comment Letter\_ LCFS RICP\_Buffer Account\_04\_18\_2018.pdf

Date and Time Comment Was Submitted: 2018-04-18 15:02:19

No Duplicates.

## **Comment 22 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Norbert  
Last Name: Schmitz  
Email Address: schmitz@iscc-system.org  
Affiliation: ISCC

Subject: Comments on Verification Approach

Comment:

Dear ARB Staff,

Thanks for the opportunity to comment on the proposed amendments to the LCFS. We would like to focus on the verification approach only.

- The amendment does not consider the existence of already well established certification schemes. The use of multi stakeholder certification schemes can be considered as best practice. Such schemes work efficient, have technical competencies, work globally, are not restricted by public sector constraints, and can re-act quickly to market changes
- The approach chosen by ARB will lead to tremendous additional costs for companies as verification / certification for different markets will require multiple audits.
- The approach chosen will increase complexity and risk of fraud, as independent verifications will take place without the option to assess supply and delivery in international supply chains and to different regulatory systems. This could result in double-claiming of certain feedstock characteristics and CI numbers
- It is extremely important to control global supply chains, particular for low carbon feedstock. It is unclear how this will be implemented.
- Government authorities can efficiently control certification schemes. Using certification schemes would not mean that Government authorities give away responsibilities of public authorities.

Kind regards,  
Norbert Schmitz  
Jan Henke  
ISCC System GmbH  
Hohenzollernring 72  
D-50672 Cologne

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-19 09:40:12

No Duplicates.

## **Comment 23 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Scott

Last Name: Olson

Email Address: scott.olson@directenergy.com

Affiliation: Direct Energy

Subject: Direct Energy and Lancaster Choice Energy's Comments on the Proposed LCFS Changes

Comment:

After a review of the changes proposed by the ARB for the LCFS program, we would like to express our support for the modifications and considerations made by ARB staff.

There are two specific items that LCE and DE would like to include in upcoming amendments to the LCFS regulations, each relates to how CCAs can participate in the LCFS market. First, the ARB should clarify that CCAs are eligible entities that can register for non-residential EV LCFS credits through the proposed Section 95483.2(b)(8). Second, the ARB should reconsider the allocation of Residential EV Charging credits to not just electric distribution utilities (EDUs), but also to CCAs. This change will allow the growing CCA customer base access to LCFS revenues to support EV incentive programs.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-lcfs18-VDBVNIIMVmkHYgVg.pdf>

Original File Name: DE LCE LCFS Comments.pdf

Date and Time Comment Was Submitted: 2018-04-19 11:13:23

No Duplicates.

## **Comment 24 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Ramasamy  
Last Name: Vasuthewan  
Email Address: [vasu@dgt-edgetech.com](mailto:vasu@dgt-edgetech.com)  
Affiliation:

Subject: Comment on the proposed LCFS Regulation

Comment:

I appreciate very much this opportunity to comment on the proposed amendments to the LCFS.

I believe that existing certification systems should be considered as companies have invested heavily in setting up the administrative infrastructure and compliance measures. Though such systems may need to be modified to suit the LCFS, it will not be nearly as expensive as an additional certification system. As the overriding objective is to promote the use of LCF, the avoidance of incremental costs will go a long way to help the industry be as competitive as possible.

Apart from cost, the use of existing, proven certification systems can help prevent double counting of the same material.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-20 00:27:51

No Duplicates.

## **Comment 25 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Steffen

Last Name: Mueller

Email Address: muellers@uic.edu

Affiliation: University of Illinois at Chicago

Subject: Comments regarding sustainability verification

Comment:

Please find attached comments from the University of Illinois at Chicago.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-lcfs18-Wy4GaQFjU19QNQJj.pdf>'

Original File Name: uic carb comments 2018.pdf

Date and Time Comment Was Submitted: 2018-04-20 05:54:16

No Duplicates.

## **Comment 26 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Tom

Last Name: Darlington

Email Address: [tdarlington@airimprovement.com](mailto:tdarlington@airimprovement.com)

Affiliation:

Subject: Questions on LCFS

Comment:

I had some questions on the above document, related to sugarcane ethanol (Table 26).

1. What is the farming energy in Ca GREE2.0 for sugarcane? It would probably be different for 80% mechanized than 65% mechanized, correct?

But if mechanized, there would be some diesel fuel use, so I expected to see some energy use in BTU/ton of cane.

2. What ethanol yield per ton of sugarcane is used in Ca GREET3.0 (gallons per ton)? I noticed that ethanol yield for corn is a required input, but see no reference to that in Table 26 for cane. That would have a significant effect on each plant's CI. Is it a required input, and if so, why does Table 26 not say so?

3. What "N in N2O" percentages are being used in CaGREET3.0 for cane? I note that it is 1.325% for crop residue for corn, and 1.225% for fertilizer for corn. Is it the same numbers in CaGREET3.0 for cane? It is not in Table 26.

4. Are there any yeast or enzymes used to produce ethanol from cane?

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-20 06:54:15

No Duplicates.

## **Comment 27 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kari

Last Name: Buttenhoff

Email Address: [kbuttenhoff@christiansoncpa.com](mailto:kbuttenhoff@christiansoncpa.com)

Affiliation:

Subject: LCFS18 Public Comments

Comment:

Please accept the attached public comments on behalf of myself and Christianson PLLP. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-lcfs18-UDxcOQRjWXIWWDwBw.pdf>

Original File Name: LCFS Proposed Rule Comments 4.20.18.pdf

Date and Time Comment Was Submitted: 2018-04-20 07:01:23

No Duplicates.

**Comment 28 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Brian

Last Name: Zupancic

Email Address: brian.zupancic@csagroup.org

Affiliation: CSA Group

Subject: Comments to Appendix B of LCFS

Comment:

Thank you for considering the attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-lcfs18- VTYGc1ExWFQAZQNs.pdf>

Original File Name: CSA comments CARB Protocol\_final.pdf

Date and Time Comment Was Submitted: 2018-04-20 08:55:53

No Duplicates.

**Comment 29 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Shelby

Last Name: Neal

Email Address: [sneal@biodiesel.org](mailto:sneal@biodiesel.org)

Affiliation: NBB/CABA

Subject: Comments on proposed amendments to LCFS regulation

Comment:

Thank you for your consideration of our views.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-lcfs18-W2kCNAAwVzwKU1Qm.pdf>'

Original File Name: 2018 Reg Package Comments 4-20-18.pdf

Date and Time Comment Was Submitted: 2018-04-20 10:15:31

No Duplicates.

## **Comment 30 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: William

Last Name: Elrick

Email Address: belrick@frontierenergy.com

Affiliation:

Subject: Hydrogen Infrastructure Pathway

Comment:

Dear Chair Nichols and Board members:

On behalf of the listed industry members, please accept the attached Hydrogen Infrastructure Pathway for consideration by the California Air Resources Board.

Thank you for your consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-lcfs18-WjYGY1w7AyMDWgRs.zip>'

Original File Name: LCFS Hydrogen Infrastructure Pathway - Attachment.zip

Date and Time Comment Was Submitted: 2018-04-20 13:46:47

No Duplicates.

## **Comment 31 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Michael

Last Name: Leone

Email Address: mleone@3phasesrenewables.com

Affiliation:

Subject: LCFS18\_3PR Comments

Comment:

We (3 Phases Renewables) appreciate the opportunity to provide comments regarding the proposed amendments to the LCFS regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-lcfs18-VjpSN1QzACBReVNg.pdf>

Original File Name: LCFS.3PR\_20.April.18.pdf

Date and Time Comment Was Submitted: 2018-04-20 14:49:02

No Duplicates.

## **Comment 32 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Joshua

Last Name: Bledsoe

Email Address: [joshua.bledsoe@lw.com](mailto:joshua.bledsoe@lw.com)

Affiliation: Latham & Watkins LLP

Subject: Carbon Creek Energy Comments on Proposed Amendments to LCFS

Comment:

Please see attached Carbon Creek Energy's comment letter on the Proposed Amendments to the Low Carbon Fuel Standard Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-lcfs18-UTJVMgFyUGEHbgVr.pdf>'

Original File Name: Carbon Creek Energy Comments on LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2018-04-20 15:00:02

No Duplicates.

## **Comment 33 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mark

Last Name: Bachman

Email Address: mbachman@mbcommunitypower.org

Affiliation: Monterey Bay Community Power

Subject: Tom Habashi MBCP: CEO Letter of Support

Comment:

This comment is to submit Monterey Bay Community Power's support for Sonoma Clean Power Authority's comments on the 2018 proposed amendments to the LCFS Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-lcfs18-VThdOVw+UXILUIA8.pdf>'

Original File Name: MBCP LCFS Letter of Support.pdf

Date and Time Comment Was Submitted: 2018-04-20 16:05:55

No Duplicates.

**Comment 34 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jim  
Last Name: Atkins  
Email Address: [jatkins@blueplanet-ltd.com](mailto:jatkins@blueplanet-ltd.com)  
Affiliation: Blue Planet Ltd.

Subject: Comments to Proposed Low Carbon Fuel Standards  
Comment:

Please see attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-lcfs18-VzRVPAdrBDpRMlc5.pdf>

Original File Name: Comments to Proposed Amendments to Low Carbon Fuel Standards.pdf

Date and Time Comment Was Submitted: 2018-04-20 16:12:28

No Duplicates.

**Comment 35 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Brian

Last Name: Pellens

Email Address: brian.pellens@crc.com

Affiliation: California Resources Corporation

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Please see attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-lcfs18-VTZUM1wvUmMHXgBs.pdf>'

Original File Name: CARB LCFS CO2 EOR Letter 04202018.pdf

Date and Time Comment Was Submitted: 2018-04-20 16:16:07

No Duplicates.

## **Comment 36 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Dustin

Last Name: Willett

Email Address: Dustin@redtrailenergy.com

Affiliation: Red Trail Energy LLC

Subject: LCFS 4-23-2018

Comment:

Please consider the comments being presented to you by Red Trail Energy. we are willing to work with you to come up with a fair and balanced plan for everyone.

thank you and have a great day.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-lcfs18-VjdRJVU2WVUHMwIv.pdf>'

Original File Name: arb 2-23-18.pdf

Date and Time Comment Was Submitted: 2018-04-22 19:46:05

No Duplicates.

## **Comment 37 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kate

Last Name: Brown

Email Address: kate.brown@parhelion.co.uk

Affiliation: Parhelion Underwriting Limited

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Dear Sir/Madam,

Please find attached Parhelion Underwriting Ltd's comments on the proposed amendments to the LCFS regulations.

Yours faithfully,

Kate Brown  
Underwriting Assistant

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-lcfs18-UmBUalVkJAGAMQM7.pdf>'

Original File Name: 280318ParhelionLCFSResponse.doc.pdf

Date and Time Comment Was Submitted: 2018-04-23 01:20:23

No Duplicates.

**Comment 38 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Bang

Last Name: Phung

Email Address: bang.phung@ladwp.com

Affiliation: LA Department of Water and Power

Subject: Comment on Proposed Amendments to LCFS

Comment:

Please see attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-lcfs18-VzsCZVUwACRXIVcI.pdf>'

Original File Name: LADWP Comment Letter on Proposed Language Final 4-20-18.pdf

Date and Time Comment Was Submitted: 2018-04-23 06:47:54

No Duplicates.

## **Comment 39 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: David

Last Name: Edwards

Email Address: [david.edwards@airliquide.com](mailto:david.edwards@airliquide.com)

Affiliation: Air Liquid

Subject: Air Liquide Recommendations for the LCFS Proposed Ammendments

Comment:

Thank you for the opportunity to comment on the LCFS Proposed Ammendments. Our comments are in the attached file.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-lcfs18-BTcGMFJiWTIGLQEx.pdf>

Original File Name: 2018-04-20 Air Liquide LCFS Letter.pdf

Date and Time Comment Was Submitted: 2018-04-23 07:33:03

No Duplicates.

## **Comment 40 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Dennis

Last Name: Rogoza

Email Address: DRogoza@gmail.com

Affiliation:

Subject: Verification For Residue and Waste Feedstocks

Comment:

This comment relates to the proposal for verification related to the recordkeeping and traceability requirements for waste and residue feedstocks. Under the proposal by CARB certification systems that already provide such verification services under the EU RED will not be recognized. This has cost implications for supply chains and for CARB, especially for international supply chains, that use these systems and wish to supply the California market. For supply chains that use EU approved certification systems they will incur duplicate costs to provide the same information to CARB as they provide to the EU. For CARB it will now need to incur substantial costs to duplicate the verification infrastructure that the certification organizations offer globally. One certification organization, ISCC, is active over 90 countries and conducts training and oversight in the US, Canada, Europe, China, South Asia and South America to ensure the low carbon fuel requirements are verified for the EU. CARB will need to provide an equivalent communication, education, training and oversight service to these supply chains inside and outside the US. As a Canadian working with the canola industry that supplies renewable fuel to the California market I anticipate attending a CARB workshop in Canada once the regulation takes effect.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-23 08:04:28

No Duplicates.

**Comment 41 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Brian

Last Name: Jennings

Email Address: bjennings@ethanol.org

Affiliation:

Subject: LCFS18 Comments

Comment:

Attached please find comments regarding the 2018 LCFS rulemaking from the American Coalition for Ethanol.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-lcfs18-BmdcOQNnV1tQOIx.pdf>'

Original File Name: ACE LCFS comments 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 09:33:02

No Duplicates.

**Comment 42 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mei

Last Name: Pan

Email Address: mpan@anaheim.net

Affiliation: City of Anaheim

Subject: Anaheim and Riverside Public Utilities Joint LCFS Comment Letter

Comment:

Please see the attached comment letter. Thank you!

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-lcfs18-AGEFc10pVFgCdlQk.pdf>'

Original File Name: APU RPU LCFS Comment Letter 042318.pdf

Date and Time Comment Was Submitted: 2018-04-23 10:11:02

No Duplicates.

## **Comment 43 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Dolores

Last Name: Barajas-Weller

Email Address: dolores@calcleanair.org

Affiliation:

Subject: CVAQ Comments on LCFS

Comment:

On behalf of the Central Valley Air Quality (CVAQ) Coalition, please accept the following comments regarding the Low Carbon Fuel Standard.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-lcfs18-B2QCclU1VHZXDIQ4.pdf>'

Original File Name: CVAQ LCFS Letter 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 10:19:56

No Duplicates.

## **Comment 44 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Chris  
Last Name: Marchand  
Email Address: cmarcha1@jaguarlandrover.com  
Affiliation: Jaguar Land Rover NA, LLC

Subject: LCFS Comments

Comment:

Dear Madam/Sir,

Please find attached Jaguar Land Rover North America's comments.

Sincerely,

Chris Marchand

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-lcfs18-BWkBZAdgWHgAWQFi.pdf>'

Original File Name: LCFS comments - JLR NA, LLC.pdf

Date and Time Comment Was Submitted: 2018-04-23 10:29:02

No Duplicates.

**Comment 45 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Lyle

Last Name: Schlyer

Email Address: lschlyer@calgren.com

Affiliation: Calgren Renewable Fuels

Subject: Comments regarding proposed LCFS amendments

Comment:

Thank you for the opportunity to submit the attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-lcfs18-VTZRNgFsBDBXIwRh.docx>'

Original File Name: Calgren Comments to 2018 LCFS Revisions.docx

Date and Time Comment Was Submitted: 2018-04-23 10:43:37

No Duplicates.

**Comment 46 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kent

Last Name: Leacock

Email Address: KLeacock@Proterra.com

Affiliation:

Subject: Proterra Comments on Proposed LCFS Amendments

Comment:

Please see attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-lcfs18-UT0GYwRjV3cCW1I+.pdf>'

Original File Name: LCFS Letter\_ARB\_Proterra.pdf

Date and Time Comment Was Submitted: 2018-04-23 10:47:54

No Duplicates.

**Comment 47 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mary

Last Name: Macpherson

Email Address: macpherson@eq-cap.com

Affiliation: Equilibrium Capital

Subject: Comments to proposed LCFS regulation

Comment:

See attached letter

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-lcfs18-AGUCdQBeVmKbwRi.pdf>'

Original File Name: EQ LCFS letter to CARB re Dairy AD (04-23-18).pdf

Date and Time Comment Was Submitted: 2018-04-23 10:18:09

No Duplicates.

**Comment 48 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Timothy

Last Name: OConnor

Email Address: [toconnor@edf.org](mailto:toconnor@edf.org)

Affiliation: Environmental Defense Fund Inc.

Subject: Comments from EDF

Comment:

Please see attached comments on the LCFS from EDF.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-lcfs18-VDECYAFmWVUDaQVm.pdf>'

Original File Name: EDF LCFS comments April 23.pdf

Date and Time Comment Was Submitted: 2018-04-23 11:28:46

No Duplicates.

## **Comment 49 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Sarah

Last Name: Johnson

Email Address: sjohnson@calstrat.com

Affiliation: California Airports Council

Subject: Comments on Proposed Amendments

Comment:

Attached are comments from the California Airports Council supporting the inclusion of Alternative Jet Fuel in the LCFS program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-lcfs18-BmVWMVU3V1sKfwN2.pdf>'

Original File Name: CAC Support for AJF Amendment to LCFS 4.23.2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 11:52:27

No Duplicates.

## **Comment 50 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Paul

Last Name: Fukumoto

Email Address: pfukumoto@fce.com

Affiliation: FuelCell Energy, Inc

Subject: Fuel Reporting Entities - Hydrogen

Comment:

Under section 95483. Fuel Reporting Entities (b) (1) (E) Hydrogen

Hydrogen producers should be provided the opportunity to report and claim credits where the hydrogen production is dedicated to supply H2 to transportation fueling station,. This case especially applies to renewable hydrogen production where the responsibility and pathway starts with the dedicated renewable H2 producer.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-23 12:52:59

No Duplicates.

## **Comment 51 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: David

Last Name: Jones

Email Address: [david.jones@innospecinc.com](mailto:david.jones@innospecinc.com)

Affiliation:

Subject: Comments on Proposed Amendments to LCFS and ADF regulations

Comment:

Please see attached comments on Proposed Amendments to LCFS and ADF regulations.

Thank you,

David Jones  
General Counsel & Chief Compliance Officer  
Innospec Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-lcfs18-Vj9dNVY5VWkKf1Ul.pdf>

Original File Name: Innospec Letter to CARB 4 23 18.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:01:20

No Duplicates.

**Comment 52 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Bill

Last Name: Magavern

Email Address: bill@ccair.org

Affiliation: Coalition for Clean Air

Subject: Coalition for Clean Air Comments on Low Carbon Fuel Standard Amendments

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-lcfs18- VTYCZ1MzUFwCaABj.pdf>'

Original File Name: CCA LCFS comments 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:20:30

No Duplicates.

**Comment 53 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: LCFS2018 Amendments

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-lcfs18-VyJVMFIgU19VMAJt.pdf>

Original File Name: UCS comments on LCFS 2018 Amendments.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:20:33

No Duplicates.

**Comment 54 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Ronald

Last Name: Koelsch

Email Address: engineering@aem.green

Affiliation: Advanced Energy Machines, LLC

Subject: Comments to Proposed Low Carbon Fuel Standard Amendments

Comment:

Please see attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-lcfs18-UT8Falc1BzwKYwll.pdf>'

Original File Name: nichols lcfs ltr 4 23 18.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:19:10

No Duplicates.

**Comment 55 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Marla

Last Name: Benyshek

Email Address: marla.k.benyshek@p66.com

Affiliation:

Subject: Comments on LCFS proposed regulation amendments

Comment:

See attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-lcfs18-WytRP1M7AzwGbAFo.pdf>'

Original File Name: Phillips 66 comments - April 23 2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:26:57

No Duplicates.

## **Comment 56 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Aidan

Last Name: Renaghan

Email Address: aidan.renaghan@dteenergy.com

Affiliation: DTE Biomass Energy Inc.

Subject: DTE Biomass Energy Comments on LCFS Amendments

Comment:

Please see attached letter for comments on the proposed LCFS amendments from DTE Biomass Energy.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-lcfs18-UDQGdFE1VloFb1Az.pdf>'

Original File Name: DTE LCFS Amendments Comment FINAL.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:31:09

No Duplicates.

## **Comment 57 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Veronica

Last Name: Bradley

Email Address: vbradley@airlines.org

Affiliation: Airlines for America

Subject: Comments on the 2018 Amendments to the Low Carbon Fuel Standard

Comment:

Please find attached comments from Airlines for America on the proposed amendments to the Low Carbon Fuel Standard.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-lcfs18-VTRdbwFhBQIRNARR.pdf>

Original File Name: A4A Comments\_LCFS Amendments\_042318FINAL.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:42:58

No Duplicates.

## **Comment 58 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Dominic  
Last Name: DiCicco  
Email Address: ddicicco@ford.com  
Affiliation: Ford Motor Company

Subject: Input on Proposed 2018 Amendments to LCFS EV charging credits  
Comment:

Ford recommends that California consider amendments to the LCFS program allowing for the inclusion of EV manufacturer participation and multiple forms of incentive offered to the consumer at point of sale.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-lcfs18-UTcBaF0uAzQDW1A8.pdf>'

Original File Name: Ford Letter to CARB on Proposed LCFS Amendments\_April 23\_2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 13:44:36

No Duplicates.

## **Comment 59 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jonathan

Last Name: Changus

Email Address: [jonathan.changus@ncpa.com](mailto:jonathan.changus@ncpa.com)

Affiliation: Northern California Power Agency

Subject: Joint POU Comments on LCFS Amendments

Comment:

Comments submitted on behalf of the Northern California Power Agency, Southern California Public Power Authority, and California Municipal Utilities Association.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-lcfs18-B2tdOFI1V3dVDAhr.pdf>'

Original File Name: LCFS\_Comments\_180423.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:17:06

No Duplicates.

**Comment 60 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jennifer

Last Name: LeRow

Email Address: jlerow@murexlt.com

Affiliation:

Subject: Comments on the Proposed LCFS Verification Program

Comment:

Please see the attached comments. Thank you in advance for your time and consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-lcfs18-VzRROFwwWWcLaFA+.pdf>'

Original File Name: Comments on the Proposed LCFS Verification Program.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:17:52

No Duplicates.

## **Comment 61 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation:

Subject: WSPA Comment Letter - LCFS General

Comment:

WSPA Comment Letter on the Overall Proposed LCFS Regulation Amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-lcfs18-BnFcKVUkADIBWAVm.pdf>'

Original File Name: WSPA Comment Letter\_ LCFS\_04\_23\_2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:13:44

No Duplicates.

## **Comment 62 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Lee

Last Name: Kindberg

Email Address: lee.kindberg@maersk.com

Affiliation: Maersk

Subject: Comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulation (LCFS18)

Comment:

Thank you for providing this opportunity to comment on LCFS18.  
Please see the attached letter.

Thank you,

Sincerely

Lee Kindberg

Head of HSE, North America

Maersk Agency USA

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-lcfs18-UD1VMgdjVHVRJAZt.pdf>'

Original File Name: Maersk Comments on LCFS18.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:16:23

No Duplicates.

**Comment 63 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: William

Last Name: Collins

Email Address: al\_collins@oxy.com

Affiliation: Occidental Petroleum Corporation

Subject: Comments on the Proposed Amendments to the LCFS

Comment:

Please find our comments in the pdf file attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-lcfs18-VMTCbVM8VmQDaQRb.pdf>'

Original File Name: Final LCFS Comments.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:26:14

No Duplicates.

**Comment 64 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jessica

Last Name: Hoffmann

Email Address: [jwhoffmann@rmpgllc.com](mailto:jwhoffmann@rmpgllc.com)

Affiliation: RPMG, Inc.

Subject: RPMG Comments on 2018 LCFS Proposed Regulatory Package

Comment:

RPMG Comments on 2018 LCFS Proposed Regulatory Package

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-lcfs18-UyMHcQwIUHdWD1Q1.pdf>'

Original File Name: RPMG LCFS Proposal Comment Letter 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:40:54

No Duplicates.

## **Comment 65 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: John

Last Name: O'Donnell

Email Address: john@glasspoint.com

Affiliation:

Subject: GlassPoint Solar comments on LCFS 45-day package

Comment:

GlassPoint is pleased to submit the attached comments on the March 6, 2018 45-day Regulatory Package.

Thank you for your attention and consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-lcfs18-Wj1cNgFhU3MEcVQk.pdf>

Original File Name: GlassPoint April 23 2017 comment letter on LCFS-1.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:45:29

No Duplicates.

## **Comment 66 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: STEFAN

Last Name: UNNASCH

Email Address: UNNASCH@LIFECYCLEASSOCIATES.COM

Affiliation: Life Cycle Associates, LLC

Subject: Conflict of interest requirements for verification

Comment:

Under the Section 95503(d) of the draft regulation order, ARB should add more stringent requirements on medium conflicts of interest. Firms that provide verification Services should list all of the conflicting Services they offer on the lcfs website. Furthermore, the requirements for medium conflict of interest should be specified. For example, individuals working on providing advice to fuel producers should not work for the same supervisor as individuals doing verification services.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-23 14:20:09

No Duplicates.

**Comment 67 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Brian

Last Name: McDonald

Email Address: BRIAN.C.MCDONALD@ANDEAVOR.COM

Affiliation:

Subject: Andeavor comments

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-lcfs18-UTBROQdiUmQDZFQi.pdf>

Original File Name: Andeavor comments LCFS 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:53:32

No Duplicates.

## **Comment 68 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: STEFAN

Last Name: UNNASCH

Email Address: UNNASCH@LIFECYCLEASSOCIATES.COM

Affiliation: Life Cycle Associates, LLC

Subject: Verifier qualificaiton requirements

Comment:

The Section 95502(c) of the draft regulation order indicates that verifiers should have a strong understanding of the CI calculations this is not necessarily true. Verifier should have an understanding of following audit procedures and make sure that the inputs correspond to the verification sheets. If ARB limits the knowledge and scope of verifiers to verifying that receipts and evidence exists the fuel producers will have a broader pool of potential verifiers.

Attachment: "

Original File Name:

Date and Time Comment Was Submitted: 2018-04-23 14:53:44

No Duplicates.

## **Comment 69 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Elizabeth

Last Name: Hepp

Email Address: elizabeth.hepp@valero.com

Affiliation: Valero Energy Corporation

Subject: Valero, Valero Renewables and Diamond Green Diesel Comments to LCFS Amendments

Comment:

Attached are the comment letters for Valero Refining Company California, Ultramar Diamond Shamrock Wilmington Refinery, Valero Marketing and Supply Company, Valero Renewable Fuels and related subsidiaries and affiliates of Valero Energy Corporation.

Valero is also submitting comments on behalf of Diamond Alternative Energy LLC.

Please contact me at 210-345-2438 if you have any questions.

Regards,  
Elizabeth Hepp

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-lcfs18-Wy0FYlQ5BTMFcQhn.zip>'

Original File Name: Valero comments proposed LCFS amendments FINAL 4-23-18.zip

Date and Time Comment Was Submitted: 2018-04-23 14:08:08

No Duplicates.

## **Comment 70 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Blair

Last Name: Swezey

Email Address: blair.swezey@sunpower.com

Affiliation: SunPower Corporation

Subject: SunPower Corporation Comments on LCFS Regulation Proposed Amendments

Comment:

Please accept the attached comments on behalf of SunPower Corporation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-lcfs18-VyQCCcQNsAyADalUi.pdf>

Original File Name: SunPower CARB LCFS Comments 042318.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:56:07

No Duplicates.

**Comment 71 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Rock  
Last Name: Zierman  
Email Address: rock@cipa.org  
Affiliation: CIPA

Subject: CIPA LCFS Comments  
Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/83-lcfs18-UDYGaVE+VmQFb1AP.pdf>'

Original File Name: FINAL CIPA LCFS 45-day Comments 04-23-18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:03:21

No Duplicates.

**Comment 72 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Michael  
Last Name: Boccadoro  
Email Address: mboccadoro@westcoastadvisors.com  
Affiliation: Agricultural Energy Consumers Associatio

Subject: Comments of AECA on Proposed Amendments LCFS Regulation  
Comment:

Please see attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/84-lcfs18-UzJUN1AyAjBRCFc0.pdf>'

Original File Name: AECA COMMENTS on CARBs proposed amendments to LCFS 4-23-18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:01:28

No Duplicates.

**Comment 73 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Bill

Last Name: Zobel

Email Address: WAZobel@trilliumcng.com

Affiliation: Trillium

Subject: LCFS Comments

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-lcfs18-AHRUIFA4WWZVPwRt.pdf>'

Original File Name: Trillium LCFS Final Comments.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:08:05

No Duplicates.

**Comment 74 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Chuck

Last Name: Woodside

Email Address: cwoodside@kaapaethanol.com

Affiliation: KAPPA Ethanol Holdings LLC

Subject: Verification Requirements in Proposed Amendments to the LCFS

Comment:

Please refer to the attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-lcfs18-AmMGclc0Ul4AZVM8.pdf>'

Original File Name: ARB Comments - KAAPA Ethanol 4-23-18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:03:07

No Duplicates.

## **Comment 75 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kevin

Last Name: Maggay

Email Address: kmaggay@semprautilities.com

Affiliation: SoCalGas

Subject: Comments on LCFS Amendments

Comment:

Attached is a zipfile containing two pdf documents, which comprise SoCalGas comments on the Proposed LCFS Amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-lcfs18-VztVMAZhVHQHXgNg.zip>'

Original File Name: LCFS Comments.zip

Date and Time Comment Was Submitted: 2018-04-23 14:17:05

No Duplicates.

**Comment 76 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Dayne

Last Name: Delahoussaye

Email Address: dayne.delahoussaye@neste.com

Affiliation: Neste US

Subject: LCFS 2018 Amendment Comments

Comment:

See attached comments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-lcfs18-UGIGMFFhVj0FLIBg.pdf>'

Original File Name: 2018-04-23 LCFS 2018 Amendments - Neste Comments.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:15:41

No Duplicates.

## **Comment 77 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jennifer  
Last Name: Holmgren  
Email Address: [jennifer@lanzatech.com](mailto:jennifer@lanzatech.com)  
Affiliation: LanzaTech, Inc.

Subject: Comments on the proposed Low Carbon Fuel Standard and Alternative Diesel Fuel Regulations

Comment:

Thank you for the opportunity to provide comments on the proposed Low Carbon Fuel Standard and Alternative Diesel Fuel Regulations. Attached please find LanzaTech's comments. We look forward to continuing to work with Air Resources Board.

Sincerely,  
Jennifer Holmgren  
CEO, LanzaTech

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-lcfs18-VGZTZVNjWTMHXII+.pdf>

Original File Name: 2019 LCFS Rulemaking Comments vf.pdf

Date and Time Comment Was Submitted: 2018-04-23 14:58:14

No Duplicates.

**Comment 78 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kim

Last Name: Do

Email Address: kdo@white-energy.com

Affiliation:

Subject: Comments on Rulemaking

Comment:

Comments on behalf of White Energy, Inc.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-lcfs18-VjVUPVc7AjxRMII8.pdf>'

Original File Name: Comments LCFS Rulemaking-04232018172200.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:18:37

No Duplicates.

## **Comment 79 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Fei

Last Name: Chi

Email Address: fchi@tesla.com

Affiliation: Tesla, Inc.

Subject: Comments to 2018 LCFS Program Updates

Comment:

Please find attached for Tesla's comments to CARB's 2018 LCFS Rulemaking. Thank you for your time and consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-lcfs18-UWNSZFZmA2gCNAM3.pdf>'

Original File Name: 20180423 Tesla Comments to 2018 LCFS Program Updates.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:19:18

No Duplicates.

## **Comment 80 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Geoff

Last Name: Cooper

Email Address: [gcooper@ethanolrfa.org](mailto:gcooper@ethanolrfa.org)

Affiliation: RFA

Subject: RFA Comments on LCFS Amendments

Comment:

Please find attached RFA's comments on the ISOR and proposed amendments.

Geoff Cooper  
636.594.2284

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-lcfs18-WylQMAZmWVUEYVc4.pdf>'

Original File Name: RFA Comments on CARB LCFS ISOR 2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:28:23

No Duplicates.

## **Comment 81 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: NRDC Comments on LCFS and ADF Rugulations

Comment:

Please find attached NRDC's comments on the proposed amendments to the LCFS and ADF regulations.

Thank you,  
Simon Mui

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/94-lcfs18-BmpQNQFmAyMHXlc0.pdf>

Original File Name: LCFS Comments\_NRDC.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:29:32

No Duplicates.

**Comment 82 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Michael

Last Name: Benn

Email Address: mike.benn@powerex.com

Affiliation:

Subject: Comments on the Proposed Amendments to the Low Carbon Fuel Standard

Comment:

Please see the attached comments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-lcfs18-U2Fcagc3VT5WfQY2.pdf>'

Original File Name: 2018-04 - Comments re LCFS Amendments.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:27:15

No Duplicates.

**Comment 83 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kim

Last Name: Kaminski

Email Address: kkaminsk@wm.com

Affiliation: Waste Management

Subject: Comments to 2018 LCFS Program

Comment:

Please see attached for our comment letter. Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-lcfs18-VyBXPABuWVVSN1My.pdf>'

Original File Name: WMO CA LCFS Amendment Comments 04 23 18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:36:43

No Duplicates.

**Comment 84 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: John

Last Name: Berge

Email Address: [jberge@pmsaship.com](mailto:jberge@pmsaship.com)

Affiliation: Pacific Merchant Shipping Association

Subject: Public Comment on Proposed Amendments to the Low Carbon Fuel Standard Regulation and to th

Comment:

PMSA Comment letter attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-lcfs18-ViYBagZ0AjALUIIx.pdf>

Original File Name: PMSA Comment LCFS EER 4-23-18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:37:12

No Duplicates.

## **Comment 85 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: William

Last Name: Westerfield

Email Address: william.westerfield@smud.org

Affiliation: Sacramento Municipal Utility District

Subject: Comments Re: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Comments by the Sacramento Municipal Utility District on Proposed Amendments to the Low Carbon Fuel Standard Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-lcfs18-WjZSMVA2AAwHMwY2.pdf>'

Original File Name: LEG 2018-0220 - Comments on Proposed Amendments to the Low Carbon Fuel Standard Regulation.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:38:38

No Duplicates.

## **Comment 86 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kye

Last Name: Gordon

Email Address: kgordon@ampamericas.com

Affiliation:

Subject: Amp Americas Response to Preliminary Draft Proposed Regulation Order and Staff Report to L

Comment:

See attached for Amp Americas response to ARB's proposed amendments to the LCFS program.

Thank you for your consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-lcfs18-VCRSJlwyUXILY1Aj.pdf>'

Original File Name: Proposed Amendments to LCFS - AMP Comments 042318.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:42:03

No Duplicates.

## **Comment 87 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: James  
Last Name: Hendry  
Email Address: [jhendry@sfwater.org](mailto:jhendry@sfwater.org)  
Affiliation: San Francisco Public Utilities Commissio

Subject: Comments of the City and County of San Francisco

Comment:

TO: Clerk of the Board

ONE OF TWO

Attached please find the comments of the City and County of San Francisco ((on behalf of its Public Utilities Commission and Metropolitan Transit Authority) on the proposed Low Carbon Fuel Standard Regulations

Separately, proposed red-line language accompanying our comments will be sent.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-lcfs18-USJWMQRrWVVRMQd1.doc>'

Original File Name: San Francisco comments on CARBs LCFS Rulemaking .doc

Date and Time Comment Was Submitted: 2018-04-23 15:38:45

No Duplicates.

## **Comment 88 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Scott

Last Name: He

Email Address: scott.hedderich@regi.com

Affiliation: REG

Subject: LCFS comments

Comment:

please accept our comments to the proposal

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-lcfs18-UCIFZlw6UV0KYAdk.docm>'

Original File Name: REG LCFS Comments for 04.27.18 Board Hearing - final.docm

Date and Time Comment Was Submitted: 2018-04-23 15:46:12

No Duplicates.

## **Comment 89 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Lance

Last Name: Cervantes

Email Address: lcervantes@dpw.lacounty.gov

Affiliation:

Subject: COMMENTS ON THE STAFF REPORT: INITIAL STATEMENT FOR PROPOSED 2018 AMENDMENTS TO LCFS

Comment:

Please see the attached document for comments from the Los Angeles County Solid Waste Management Committee/ Integrated Waste Management Task Force (Task Force). These comments are submitted by Los Angeles County Public Works on behalf of the Task Force.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-lcfs18-VjoAZVUyAiRRMgBs.pdf>

Original File Name: LCFuelStdRegAmendments.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:42:56

No Duplicates.

## **Comment 90 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: James

Last Name: Hendry

Email Address: [jhendry@sfwater.org](mailto:jhendry@sfwater.org)

Affiliation: San Francisco Public Utilities Commissio

Subject: Comments of the City and County of San Francisco

Comment:

TO: Clerk of the Board

TWO OF TWO

Attached please find the ATTACHMENT to the comments of the City and County of San Francisco ((on behalf of its Public Utilities Commission and Metropolitan Transit Authority) on the proposed Low Carbon Fuel Standard Regulations

THE ATTACHEMENT contains proposed red-line language for the regulations.

PART ONE OF OUR TRANSMITTAL contained San Francisco's comments on the regulations.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-lcfs18-VztRJwdYVGMcHXlc.pdf>'

Original File Name: San Francisco Proposed Changes to LCFS Regulation.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:38:45

No Duplicates.

## **Comment 91 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Tim

Last Name: Carmichael

Email Address: TCarmichael@semprautilities.com

Affiliation: San Diego Gas & Electric Company

Subject: Proposed Changes to the Low Carbon Fuel Standard Regulation

Comment:

Attached are comments from San Diego Gas & Electric Company regarding proposed changes to the Low Carbon Fuel Standard Regulation.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-lcfs18-BnVSMFQyWG5VDAZl.pdf>'

Original File Name: SDGE Comments LCFS-Change to Regulation 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:49:48

No Duplicates.

## **Comment 92 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Todd

Last Name: Campbell

Email Address: Todd.Campbell@cleanenergyfuels.com

Affiliation:

Subject: Clean Energy's Comments to Proposed LCFS Amedments

Comment:

Attached are Clean Energy's comments to the proposed LCFS amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-lcfs18-BWYFb1YyWWsGblcI.pdf>'

Original File Name: Clean Energy LCFS Amendment Comment Letter 20180423 ARB.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:25:53

No Duplicates.

## **Comment 93 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: cathy@wspa.org  
Affiliation:

Subject: WSPA Comment Letter - CCSP

Comment:

WSPA Comment Letter on the Carbon Capture & Sequestration Protocol (CCSP) element of the Proposed ARB LCFS Regulation Amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/108-lcfs18-VCMFcFwtADIAWQNg.pdf>'

Original File Name: WSPA Comment Letter\_ CCSP\_04\_23\_2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:32:56

No Duplicates.

## **Comment 94 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Greg

Last Name: Kester

Email Address: [gkester@casaweb.org](mailto:gkester@casaweb.org)

Affiliation: California Assoc of Sanitation Agencies

Subject: Comments on Proposed Changes to LCFS Program

Comment:

Please find attached comments from the California Association of Sanitation Agencies on proposed regulatory changes to the LCFS program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-lcfs18-VGAFLIBjAmJXfFdm.pdf>

Original File Name: 4-23-18 CASA Comments on LCFS Proposed changes[1].pdf

Date and Time Comment Was Submitted: 2018-04-23 15:58:08

No Duplicates.

**Comment 95 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Scott

Last Name: Hernandez

Email Address: scott.hernandez@cblmarkets.com

Affiliation:

Subject: CBL Comments on LCFS Proposed Amendments

Comment:

Thanks for the opportunity to submit comments. Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/110-lcfs18- VTYBZVM+Aw8KYAFi.pdf>'

Original File Name: CBL LCFS Comments\_4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 15:55:42

No Duplicates.

**Comment 96 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: CalETC

Subject: LCFS Item 18-3-3 Comments

Comment:

Please see the attached comment letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-lcfs18-VzQAZ1M+WW9WJABj.pdf>'

Original File Name: CalETC Comment Letter LCFS 18-3-3 Final.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:09:07

No Duplicates.

**Comment 97 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Charles

Last Name: Russel

Email Address: Non-web submitted comment

Affiliation: Eversheds Sutherland

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-lcfs18-VTZXP1wwVGpWNVM9.pdf>'

Original File Name: Comment Letter 2018 LCFS Proposed Amendments (EXECUTED).pdf

Date and Time Comment Was Submitted: 2018-04-23 16:12:51

No Duplicates.

**Comment 98 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jay

Last Name: Hopper

Email Address: Jay.Hopper@ariaenergy.com

Affiliation: Aria Energy

Subject: Comments to 2018 LCFS Program

Comment:

Please find our comments attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/114-lcfs18-AmNWIgRsV2VSCwRh.pdf>'

Original File Name: Aria Energy LCFS Support Letter.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:13:17

No Duplicates.

## **Comment 99 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Julia

Last Name: Levin

Email Address: [jlevin@bioenergyca.org](mailto:jlevin@bioenergyca.org)

Affiliation: Bioenergy Association of California

Subject: Comments on Proposed LCFS amendments

Comment:

Attached please find the Bioenergy Association of California's comments on the proposed amendments to the LCFS program.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-lcfs18-VzVWMQdlAAwFYFM8.pdf>'

Original File Name: BAC Comments on Proposed LCFS changes.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:16:58

No Duplicates.

## **Comment 100 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Deepika

Last Name: Nagabhushan

Email Address: Non-web submitted comment

Affiliation: Clean Air Task force (CATF)

Subject: Carbon Capture and Sequestration Protocol

Comment:

Dear Clerk of the Board,

Clean Air Task Force (CATF) appreciates the continued opportunity to provide comments to California Air Resources Board (CARB) on the proposed amendments to the Low Carbon Standard (LCFS) regulation, specifically Appendix B – Attachment 1: Carbon Capture and Sequestration Protocol (Protocol).

Please find attached a PDF document containing CATF's recommendation & comment letter as well as CATF's recommendations in form of redline edits to parts of the proposed Protocol's language.

Thank you,

Deepika Nagabhushan, Energy Policy Associate

James P. Duffy, Associate Attorney

Bruce Hill, Ph.D., Chief Geoscientist

John Thompson, Director, Fossil Transition Project

Kurt Waltzer, Managing Director

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/117-lcfs18-VzRRNIUgBDEKUwM3.pdf>'

Original File Name: CATF 45-day Comments\_and\_Redline\_Apr23\_.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:18:00

No Duplicates.

**Comment 101 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Stephan

Last Name: McComb

Email Address: Stephen.McComb@theice.com

Affiliation:

Subject: Comments on the regulatory amendments to the Low Carbon Fuel Standard

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/118-lcfs18-UzpQNVYyBAgEbgJh.pdf>'

Original File Name: ICE LCFS Comment.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:20:26

No Duplicates.

## **Comment 102 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
Affiliation: Noyes Law Corporation

Subject: Proposed LCFS Regulations Pertaining to Alternative Jet Fuel  
Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/119-lcfs18-WjsHawdgV1sEclUn.pdf>'

Original File Name: AJF Producer Comments LCFS 23 April 2018 FINAL.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:22:11

No Duplicates.

**Comment 103 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Graham

Last Name: Noyes

Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)

Affiliation: Noyes Law Corporation

Subject: Request for Clarification of Specified Source Feedstock

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-lcfs18-ADJTZVZmUDsDKAYy.pdf>'

Original File Name: 2018-4-23 Fulcrum Comment RE LCFS Design Based and Feedstock.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:23:45

No Duplicates.

**Comment 104 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Graham  
Last Name: Noyes  
Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
Affiliation: Noyes Law Corporation

Subject: Request for Clarification of Specified Source Feedstock  
Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-lcfs18-BXYZlw7BzFQIgN6.pdf>'

Original File Name: Safety Kleen Comment RE Specified Source Feedstock.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:23:45

No Duplicates.

**Comment 105 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Graham

Last Name: Noyes

Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)

Affiliation: Noyes Law Corporation

Subject: Low Carbon Fuel Standard Extension

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-lcfs18-BWkGYwNkBDQBFU5.pdf>'

Original File Name: LCFC LCFS Extension Comment 23 April 2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:23:45

No Duplicates.

## **Comment 106 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: George

Last Name: Peridas

Email Address: [gperidas@nrdc.org](mailto:gperidas@nrdc.org)

Affiliation:

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/123-lcfs18-BmpWMwZhU3NVDFc0.pdf>

Original File Name: LCFS\_CCS Comments\_Joint\_23Apr2018\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:27:02

No Duplicates.

**Comment 107 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Ruben

Last Name: Aronin

Email Address: ruben@betterworldgroup.com

Affiliation:

Subject: Strengthen the LCFS and extend it to 2030

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/124-lcfs18-BWIXMIM0AyMFXAJy.pdf>'

Original File Name: LCFS Policy Consensus - final updated 042318.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:28:56

No Duplicates.

## **Comment 108 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Michael

Last Name: Backstrom

Email Address: michael.backstrom@sce.com

Affiliation: Southern California Edison

Subject: SCE's Comments on Proposed Changes to the Low Carbon Fuel Standard

Comment:

Attached please find signed letter regarding LCFS18.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-lcfs18-WzYHYFAjVH5VDAZo.pdf>'

Original File Name: Mary Nichols LCFS 042318.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:20:12

No Duplicates.

## **Comment 109 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Pawel

Last Name: Ryzinski

Email Address: [pryzinski@schottassocs.com](mailto:pryzinski@schottassocs.com)

Affiliation: Staff

Subject: California Association of Port Authorities' Comments

Comment:

Attached are California Association of Port Authorities' comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulation and to the regulation on Commercialization of Alternative Diesel Fuels.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-lcfs18-WjkAZ10wAjhQMAFu.pdf>'

Original File Name: California Association of Port Authorities LCFS Comments 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:32:19

No Duplicates.

## **Comment 110 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Robert

Last Name: Wyman

Email Address: robert.wyman@lw.com

Affiliation: Latham & Watkins LLP

Subject: CCS Quantification Methodology

Comment:

Letter attached. Thank you for your consideration.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/127-lcfs18-VjpQN1QhUmkGYQdq.pdf>'

Original File Name: Latham Letter re CCS PISC.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:42:24

No Duplicates.

## **Comment 111 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Steven  
Last Name: Eisenberg  
Email Address: steven.eisenberg@srectrade.com  
Affiliation: SRECTrade, Inc.

Subject: Submission of LCFS 2018 Regulation Comments

Comment:

Hello,

Please find attached our comment letter. We appreciate your consideration and review.

Thank you.

Best,  
Steven

Steven Eisenberg  
SRECTrade, Inc.  
201 California St. Suite 630  
San Francisco, CA 94111  
P: (415) 702-0863  
steven.eisenberg@srectrade.com  
www.srectrade.com

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-lcfs18-UiFdKQRgAzMFdwR2.pdf>'

Original File Name: SRECTrade Comments to CARB LCFS 2018 Regs\_April 23 2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:05:17

No Duplicates.

## **Comment 112 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Don

Last Name: Gilstrap

Email Address: dgilstrap@chevron.com

Affiliation:

Subject: Chevron Comments on 2018 LCFS Amendments

Comment:

Enclosed are Chevron's comments for the proposed amendments.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-lcfs18-B2QGdlApAg5WYIBg.pdf>'

Original File Name: CVX 2018 LCFS Amendments Comments.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:46:53

No Duplicates.

## **Comment 113 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jenny

Last Name: Bard

Email Address: [jenny.bard@lung.org](mailto:jenny.bard@lung.org)

Affiliation:

Subject: Public Health Support for Stronger LCFS Target

Comment:

Attached please find letter from 27 health and medical organizations and dozens of health professionals in support of the strongest possible LCFS target.

Thank you.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-lcfs18-VDhRNFUyU3MDWghg.pdf>'

Original File Name: LCFS Health Group Letter Final.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:47:23

No Duplicates.

## **Comment 114 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mark

Last Name: Moser

Email Address: [contact@rcmdigesters.com](mailto:contact@rcmdigesters.com)

Affiliation: RCM International LLC

Subject: Manure for Power LCFS

Comment:

Please refer to the attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/131-lcfs18-VThUPQFzWG5XI1cI.pdf>

Original File Name: Moser Manure for Power LCFS.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:45:51

No Duplicates.

## **Comment 115 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Melinda  
Last Name: Hicks  
Email Address: mhicks@kernoil.com  
Affiliation: Kern Oil & Refining Co.

Subject: Comments on LCFS Rulemaking 45-day Package

Comment:

Thank you for the opportunity to provide comments. Please see specific comments in attached letter.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-lcfs18-AGsAY1IhAj8FXABv.pdf>'

Original File Name: Kern Oil Comments on LCFS 45-day Package 04-23-2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:47:31

No Duplicates.

## **Comment 116 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Neal  
Last Name: Reardon  
Email Address: [nreardon@sonomacleanpower.org](mailto:nreardon@sonomacleanpower.org)  
Affiliation: Sonoma Clean Power

Subject: Comments of Smart EV Charging Group on LCFS

Comment:

Attached please find the Smart EV Charging Group's Comments on the 2018 Proposed Amendments to the Low-Carbon Fuel Standard Regulation

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/133-lcfs18-AHNcN1ExV3ZSIFcI.pdf>'

Original File Name: Smart EV Charging Group Comments on LCFS (23Apr2018) (00438378-2xBA8E1).pdf

Date and Time Comment Was Submitted: 2018-04-23 16:46:43

No Duplicates.

## **Comment 117 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: STEFAN

Last Name: UNNASCH

Email Address: UNNASCH@LIFECYCLEASSOCIATES.COM

Affiliation: Life Cycle Associates, LLC

Subject: Corn Oil Allocation comments and example

Comment:

Please refer to the attached zip file with the comment letter and supplementary data.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/134-lcfs18-WzdWMwZmAw9VfgdY.zip>'

Original File Name: LCA\_-\_CO\_Allocation\_comments.zip

Date and Time Comment Was Submitted: 2018-04-23 16:45:51

No Duplicates.

## **Comment 118 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Thomas

Last Name: Lawson

Email Address: thomas@cngvc.org

Affiliation:

Subject: CNGVC Comments

Comment:

Attached are our comments on the 2018 LCFS amendments

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/135-lcfs18-VjVTOwZgAyYHYghX.pdf>

Original File Name: CNGVC Final Comment Letter on 2018 LCFS Amendments 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:54:38

No Duplicates.

## **Comment 119 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Rick  
Last Name: Umoff  
Email Address: rumoff@seia.org  
Affiliation: SEIA

Subject: SEIA Comments re LCFS 4.23.18

Comment:

Attached are the comments of the Solar Energy Industries Association regarding the Low-Carbon Fuel Standard.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/136-lcfs18-AHNWNVA4BzUGXwlq.pdf>'

Original File Name: SEIA Comments re LCFS 4.23.18.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:35:37

No Duplicates.

**Comment 120 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Linus

Last Name: Farias

Email Address: lfb@pge.com

Affiliation: Pacific Gas and Electric Company

Subject: Comments on Proposed LCFS regulation

Comment:

Please find PG&E's comments attached

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/138-lcfs18-U2dWZQZYVGMLbAV8.pdf>'

Original File Name: 45 Day Package Comments 04-23-2018.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:56:30

No Duplicates.

## **Comment 121 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Joy

Last Name: Alafia

Email Address: joy@westernpga.org

Affiliation:

Subject: LCFS

Comment:

Please see comment letter attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-lcfs18-AHdRJwdhBzVXDgNv.pdf>'

Original File Name: WPGA\_LCFS Comments 4\_23\_18.docx.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:37:21

No Duplicates.

## **Comment 122 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Amanda  
Last Name: Myers  
Email Address: amanda.myers@chargepoint.com  
Affiliation: ChargePoint, Inc.

Subject: ChargePoint Comments on LCFS 2018 Proposed Regulation Order  
Comment:

Please see attached for ChargePoint's comments on the LCFS 2018 Proposed Regulation Order.

Thank you very much for the opportunity to comment.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-lcfs18-VztXMgZhBycCWwFi.pdf>'

Original File Name: LCFS comments FINAL.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:56:44

No Duplicates.

## **Comment 123 for LCFS 2018 (lcfs18) - 45 Day.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 124 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Colin  
Last Name: Murphy  
Email Address: colin.murphy@nextgenpolicy.org  
Affiliation: NextGen Policy Center

Subject: Update to LCFS report on docket

Comment:

Please find attached NextGen's comment on the proposed rulemaking, completed Illustrative Compliance Scenario Calculators for our suggested 23% and 24% 2030 CI targets, an updated version of the Cerulogy Research Report "California's Clean Fuel Future" and two memos which are cited appendices to the report.

Note that this version of the report supersedes the version from the previous comment, which we have asked the clerk of the board to withdraw.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/145-lcfs18-AG4FZlwIUhDQMQRh.zip>'

Original File Name: NextGen Submission.zip

Date and Time Comment Was Submitted: 2018-04-23 16:56:16

No Duplicates.

**Comment 125 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Ralph

Last Name: Moran

Email Address: Non-web submitted comment

Affiliation: BP America, Inc

Subject: BP Comments on LCFS Standard Regulation

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/147-lcfs18-UTMHcQRaAzNSOwdq.pdf>'

Original File Name: BP comments to CARB on LCFS RICP 4 18.pdf

Date and Time Comment Was Submitted: 2018-04-23 16:56:16

No Duplicates.

**Comment 126 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Robert

Last Name: Van Voorhees

Email Address: Non-web submitted comment

Affiliation:

Subject: Comments Proposed Low Carbon Fuel Standard Regulation Amendments

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/148-lcfs18-UyEAYFIIUHUKUwV1.zip>'

Original File Name: RFVV PLLC Detailed Comments on LCFS Proposal.zip

Date and Time Comment Was Submitted: 2018-04-23 16:56:16

No Duplicates.

**Comment 127 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Leticia

Last Name: Phillips

Email Address: Non-web submitted comment

Affiliation: UNICA

Subject: Proposed Amendments to the LCFS

Comment:

Late comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/149-lcfs18-AHdRJMgZhWXkAD1Q1.zip>'

Original File Name: 20180423 UNICA Comments to CARB.zip

Date and Time Comment Was Submitted: 2018-04-24 11:41:24

No Duplicates.

## **Comment 128 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kriss

Last Name: Gross

Email Address: Non-web submitted comment

Affiliation: California Biomass Energy Alliance

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Late comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/150-lcfs18-UzBVMlckVGUCWwVm.pdf>'

Original File Name: CARB CBEA LCFS Comments 04-24-2018 (FINAL).pdf

Date and Time Comment Was Submitted: 2018-04-25 09:31:22

No Duplicates.

## **Comment 129 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Rachel

Last Name: Kloos

Email Address: Non-web submitted comment

Affiliation:

Subject: CA-GREET 3.0 / Simplified Calculator Comments

Comment:

Late comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/151-lcfs18-AmFdOlxwWW0FcQls.pdf>'

Original File Name: CA-GREET 3.0 Simplified Calculator Comments.pdf

Date and Time Comment Was Submitted: 2018-04-25 14:35:40

No Duplicates.

**Comment 130 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Eileen

Last Name: Tutt

Email Address: Non-web submitted comment

Affiliation: CalETC

Subject: Auto/Utility LCFS Discussion

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/153-lcfs18-AWAFdIMmVGgGX1c2.pdf>'

Original File Name: Auto and Utility LCFS Agenda April 12.pdf

Date and Time Comment Was Submitted: 2018-04-25 14:52:29

No Duplicates.

## **Comment 131 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Kelli

Last Name: M

Email Address: Non-web submitted comment

Affiliation:

Subject: Extend LCFS

Comment:

Late Comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/154-lcfs18-UToAYwdqWGdVOgJd.pdf>

Original File Name: Kelli M..pdf

Date and Time Comment Was Submitted: 2018-04-26 10:14:31

No Duplicates.

## **Comment 132 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Jim

Last Name: Thurston

Email Address: Non-web submitted comment

Affiliation:

Subject: Extend CA LCFS

Comment:

Late Comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/155-lcfs18-AmhSPVU5Ag4EdgBo.pdf>'

Original File Name: Jim Thurston.pdf

Date and Time Comment Was Submitted: 2018-04-26 10:14:31

No Duplicates.

**Comment 133 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Mary

Last Name: Griffith

Email Address: Non-web submitted comment

Affiliation:

Subject: Extend CA LCFS

Comment:

Late Comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/156-lcfs18-Am9SNVEiAylXDgRj.pdf>'

Original File Name: Mary Griffith.pdf

Date and Time Comment Was Submitted: 2018-04-26 10:14:31

No Duplicates.

**Comment 134 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: (Illegible)

Last Name: (Illegible)

Email Address: Non-web submitted comment

Affiliation:

Subject: Extend CA LCFS

Comment:

Late Comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/157-lcfs18-VSBXPwRxBD5RIwVp.pdf>'

Original File Name: Untitled.pdf

Date and Time Comment Was Submitted: 2018-04-26 10:14:31

No Duplicates.

**Comment 135 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Daphane

Last Name: Ferguson

Email Address: Non-web submitted comment

Affiliation: Enerkem

Subject: Proposed Amendments to the LCFS

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/178-lcfs18-BWBWPgNnVXQHagdi.pdf>'

Original File Name: Enerkem comments on proposed regulation order 23.04.2018.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:04:55

No Duplicates.

## **Comment 136 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Janelle

Last Name: London

Email Address: Non-web submitted comment

Affiliation: Coltura

Subject: Comments on the 2018 Proposed Amendments to the Low-Carbon Fuel Standard Regulation

Comment:

Late comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/179-lcfs18-BmVcNQFtAz0FZlQ6.pdf>'

Original File Name: Comments on the 2018 Proposed Amendments to the Low-Carbon Fuel Standard Regulation.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:23:24

No Duplicates.

## **Comment 137 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Diane

Last Name: Bailey

Email Address: Non-web submitted comment

Affiliation: Menlo Spark

Subject: Comments on the 2018 Proposed Amendments to the Low-Carbon Fuel Standard Regulation

Comment:

Late Comment. See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/180-lcfs18-BmVQOVY6UW9VNgZo.pdf>'

Original File Name: Comments on the 2018 Proposed Amendments to the Low-Carbon Fuel Standard Regulation Menlo Park.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:27:58

No Duplicates.

## **Comment 138 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Karen

Last Name: O'Brien

Email Address: Non-web submitted comment

Affiliation:

Subject: Biogas GHG in GREET 3.0

Comment:

See attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/181-lcfs18-UjBcM1wyADRRNgJx.pdf>'

Original File Name: Biogas GHG in GREET 3.0.pdf

Date and Time Comment Was Submitted: 2018-05-09 14:37:02

No Duplicates.

## **Comment 139 for LCFS 2018 (lcfs18) - 45 Day.**

First Name: Emanuel

Last Name: Wagner

Email Address: Non-web submitted comment

Affiliation: California Hydrogen Business Council

Subject: CHBC Comments

Comment:

Please see attached.

Attachment: '<https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/182-lcfs18-VDhTNII1UHABWARn.pdf>'

Original File Name: LCFS Comment.pdf

Date and Time Comment Was Submitted: 2018-05-31 11:51:19

No Duplicates.

## **Comment 1 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Graham

Last Name: Noyes

Email Address: Non-web submitted comment

Affiliation: Noyes Law Corporation

Subject: Alternative Jet Fuel Producer Comment

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/158-lcfs18-UGFQbgEtWDgHLFJh.pdf>

Original File Name: 18-3-3 Graham Noyes.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:37:03

No Duplicates.

## **Comment 2 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Leticia

Last Name: Phillips

Email Address: Non-web submitted comment

Affiliation: UNICA

Subject: UNICA's Comments on CARB Proposed Amendments to the LCFS

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/159-lcfs18-UGFXaQQoA2NVfldk.pdf>

Original File Name: 18-3-3 Leticia Phillips.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:39:08

No Duplicates.

### **Comment 3 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Jeffrey

Last Name: Lautt

Email Address: Non-web submitted comment

Affiliation: POET

Subject: Proposed Amendments to the LCFS and the Regulation on the Commercialization of ADF

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/160-lcfs18-UWBVawYqBGQFLgk6.pdf>

Original File Name: 18-3-3 Jeffrey Lautt.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:43:17

No Duplicates.

## **Comment 4 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Chris

Last Name: Bliley

Email Address: Non-web submitted comment

Affiliation: Growth Energy

Subject: Proposed Amendments to the LCFS and the Regulation on the Commercialization of ADF

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/161-lcfs18-V2ZVawMvVDQKIQU2.pdf>

Original File Name: 18-3-3 Chris Bliley.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:45:46

No Duplicates.

## **Comment 5 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: John

Last Name: Sens

Email Address: Non-web submitted comment

Affiliation: Eco Engineers

Subject: LCFS Extension Draft Regulation

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/162-lcfs18-VmdUalJ+UTFQewk6.pdf>

Original File Name: 18-3-3 John Sens.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:47:09

No Duplicates.

## **Comment 6 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Ryan

Last Name: Schuchard

Email Address: Non-web submitted comment

Affiliation: CALSTART

Subject: Proposed Amendments to the LCFS and the Regulation on the Commercialization of ADF

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/163-lcfs18-VWRUaIF9UDBWfVdk.pdf>

Original File Name: 18-3-3 Ryan Schuchard.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:48:40

No Duplicates.

## **Comment 7 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Simon

Last Name: Mui

Email Address: Non-web submitted comment

Affiliation: Sonoma Technology, Inc.

Subject: Review of CARB Document Appendix G

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/164-lcfs18-W2pRb1xwA2MDKAEy.pdf>

Original File Name: 18-3-3 Simon Mui.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:50:00

No Duplicates.

## **Comment 8 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Sean

Last Name: Hecht

Email Address: Non-web submitted comment

Affiliation: Emmett Institute on Climate Change

Subject: Comment on Proposed Amendments to the LCFS

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/165-lcfs18-VmdXaQcrUDBSeVNg.pdf>

Original File Name: 18-3-3 Sean Hart.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:51:23

No Duplicates.

## **Comment 9 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Daniel

Last Name: Sanchez

Email Address: Non-web submitted comment

Affiliation: Carnegie Institution for Science

Subject: Opportunities for ethanol-CCS under lcfs

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/166-lcfs18-BTRTbVB8BWVWfQIx.pdf>

Original File Name: 18-3-3 Daniel Sanchez.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:52:46

No Duplicates.

## **Comment 10 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Brian

Last Name: Biering

Email Address: Non-web submitted comment

Affiliation: Sonoma Clean Power Assoc.

Subject: Smart EV Charging Group Comments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/167-lcfs18-BjdUalZ6VDQHLFJh.pdf>

Original File Name: 18-3-3 Brian Biering.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:54:19

No Duplicates.

## **Comment 11 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Brian

Last Name: Goldstein

Email Address: Non-web submitted comment

Affiliation: Energy Independence Now

Subject: Comment on Proposed Amendments to the LCFS

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/168-lcfs18-ATBdYwEtBGQELwc0.pdf>

Original File Name: 18-3-3 Brian Goldstein.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:54:19

No Duplicates.

## **Comment 12 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Melinda

Last Name: Franklin

Email Address: Non-web submitted comment

Affiliation: United Airlines

Subject: The addition of AJF as opt-in credit-generating biofuels

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/169-lcfs18-V2ZUalB8VTUELwc0.pdf>

Original File Name: 18-3-3 Melinda Franklin.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:56:53

No Duplicates.

## **Comment 13 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Bryan

Last Name: Sherbacow

Email Address: Non-web submitted comment

Affiliation: World Energy

Subject: AltAir Paramount Comments on AJF Elements

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/171-lcfs18-VGVUagAsVDRVfINg.pdf>

Original File Name: 18-3-3 Bryan Sherbacow.pdf

Date and Time Comment Was Submitted: 2018-04-30 14:58:35

No Duplicates.

## **Comment 14 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Deepika

Last Name: Nagabhushan

Email Address: Non-web submitted comment

Affiliation: Clean Air Task force

Subject: Comments at the public hearing to consider proposed amendments to the lcfs and adf

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/173-lcfs18-ATBWaAAsVTUFLgc0.pdf>

Original File Name: 18-3-3 Deepika Nagabhushan.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:00:56

No Duplicates.

## **Comment 15 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Briana

Last Name: Mordick

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed Amendments to the LCFS and ADF: Carbon Capture and Sequestration Protocol

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/174-lcfs18-UmMCPFF9VjZQe1Rn.pdf>

Original File Name: 18-3-3 Briana Mordick.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:04:55

No Duplicates.

## **Comment 16 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Keri

Last Name: Bevel

Email Address: Non-web submitted comment

Affiliation: Element Markets

Subject: Proposed Amendments to the LCFS

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/175-lcfs18-UWAGOFB8VzdWfVVm.pdf>

Original File Name: 18-3-3 Nina Kapoor.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:04:55

No Duplicates.

## **Comment 17 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Jason

Last Name: Barbose

Email Address: Non-web submitted comment

Affiliation:

Subject: Extend the LCFS to 2030

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/176-lcfs18-AjMBP1J+AGACKVBj.pdf>

Original File Name: 18-3-3 Jason Barbose.pdf

Date and Time Comment Was Submitted: 2018-04-30 15:04:55

No Duplicates.

## **Comment 18 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Erin

Last Name: Cooke

Email Address: Non-web submitted comment

Affiliation: San Francisco International Airport

Subject: Comments on LCFS

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/183-lcfs18-BmoHYgdgVnYLUIQ3.pdf>

Original File Name: LCFS Comment.pdf

Date and Time Comment Was Submitted: 2018-06-08 14:36:05

No Duplicates.

## **Comment 19 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: George

Last Name: Peridas

Email Address: Non-web submitted comment

Affiliation: NRDC

Subject: Comments on CCS Protocol

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/331-lcfs18-B3dXNFEiBz1VNwBh.pdf>

Original File Name: peridas.pdf

Date and Time Comment Was Submitted: 2018-10-01 09:56:22

No Duplicates.

## **Comment 20 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Myles

Last Name: Culhane

Email Address: Non-web submitted comment

Affiliation:

Subject: Proposed CCS Protocol and Amendments to LCFS

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/332-lcfs18-BmUCcV0wAzgGYVc5.pdf>

Original File Name: Culhane.pdf

Date and Time Comment Was Submitted: 2018-10-01 09:58:13

No Duplicates.

## **Comment 21 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Pat

Last Name: McDuff

Email Address: Non-web submitted comment

Affiliation: California Fueling

Subject: Comments on LCFS Response to Comments

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/333-lcfs18-VTgFYFE0AiRRMVUz.pdf>

Original File Name: mcduff.pdf

Date and Time Comment Was Submitted: 2018-10-01 09:59:25

No Duplicates.

## **Comment 22 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Deepika

Last Name: Nagabhushan

Email Address: Non-web submitted comment

Affiliation: Clean Air Task Force

Subject: Comments on the LCFS Regulation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/334-lcfs18-BmJQM1QwAiFSPQhj.pdf>

Original File Name: deepika.pdf

Date and Time Comment Was Submitted: 2018-10-01 10:00:20

No Duplicates.

## **Comment 23 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Colin

Last Name: Murphy

Email Address: Non-web submitted comment

Affiliation: Nextgen California

Subject: Comments on the Final Regulatory Order amending the LCFS

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/335-lcfs18-UTwHdANwBSZRP1Us.pdf>

Original File Name: murphy.pdf

Date and Time Comment Was Submitted: 2018-10-01 10:01:21

No Duplicates.

## **Comment 24 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Leticia

Last Name: Phillips

Email Address: Non-web submitted comment

Affiliation: UNICA

Subject: Comments on the LCFS Regulation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/336-lcfs18-UCAFawFpAD8Bawdu.pdf>

Original File Name: phillips.pdf

Date and Time Comment Was Submitted: 2018-10-01 10:02:41

No Duplicates.

## **Comment 25 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: Erin

Last Name: Donnette

Email Address: Non-web submitted comment

Affiliation: Wolrd Energy

Subject: Comments on the LCFS Regulation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/337-lcfs18-UzcFbFI9Aj9XNFQg.pdf>

Original File Name: donnnette.pdf

Date and Time Comment Was Submitted: 2018-10-01 10:04:03

No Duplicates.

## **Comment 26 for LCFS 2018 (lcfs18). (At Hearing)**

First Name: James

Last Name: Lyons

Email Address: Non-web submitted comment

Affiliation: Wagner Jones Helsley PC

Subject: Comments on LCFS and ADF

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/338-lcfs18-BmpUKwZoBzoCd1d5.pdf>

Original File Name: Lyons.pdf

Date and Time Comment Was Submitted: 2018-10-01 10:49:09

No Duplicates.

## **Comment 1 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Al

Last Name: Collins

Email Address: al\_collins@oxy.com

Affiliation:

Subject: Comments to the California Air Resources Board, Carbon Capture and Sequestration Protocol

Comment:

Please see attachment. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/184-lcfs18-UzBUPVwwBTsHZFA+.pdf>

Original File Name: Comments to CARB Carbon Capture and Seq. Protocol (March 2018).pdf

Date and Time Comment Was Submitted: 2018-06-21 13:47:42

No Duplicates.

**Comment 2 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Pat

Last Name: McDuff

Email Address: Non-web submitted comment

Affiliation:

Subject: LCFS18 - Public Comment

Comment:

See attached document.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/186-lcfs18-BmVROAZqV2kKaVI8.pdf>

Original File Name: Comments to June 2018 ADF 06.26.18.pdf

Date and Time Comment Was Submitted: 2018-06-26 14:33:52

No Duplicates.

### **Comment 3 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Kent

Last Name: Lecock

Email Address: KLeacock@Proterra.com

Affiliation:

Subject: LCFS Comment Letter

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/187-lcfs18-B2sAZQZhBSUDWII+.pdf>

Original File Name: LCFS Letter\_Proterra\_June 29.pdf

Date and Time Comment Was Submitted: 2018-06-29 10:22:27

No Duplicates.

## **Comment 4 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Shelby

Last Name: Neal

Email Address: [sneal@biodiesel.org](mailto:sneal@biodiesel.org)

Affiliation: National Biodiesel Board

Subject: Comments on 15-day changes to LCFS & ADF

Comment:

Thanks for your consideration of our views.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/188-lcfs18-BTdSZFxsVzwLUIJj.pdf>

Original File Name: 2018 15-Day Change Comments 7-5-18.pdf

Date and Time Comment Was Submitted: 2018-07-02 10:19:53

No Duplicates.

## **Comment 5 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Richard  
Last Name: Mattocks  
Email Address: [rmattocks@martinenergygroup.com](mailto:rmattocks@martinenergygroup.com)  
Affiliation: Martin Energy Group

Subject: Enabling Biogas Fueling of Midwest Ethanol Plants

Comment:

Increase low carbon cornbelt Ethanol by encouraging biogas or power from biogas to be transported to not otherwise adjacent but relatively close ethanol plants.

Don't lose these opportunities

Thank you.

Respectfully,

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-07-02 16:22:22

No Duplicates.

## **Comment 6 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Jacqueline

Last Name: Moore

Email Address: jacqueline.moore@polb.com

Affiliation: Port Of Long Beach

Subject: Port of Long Beach comments on LCFS amendments

Comment:

Please find attached POLBs comment letter on the LCFS Amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/190-lcfs18-UWNRZ1FhWTIGMFVi.pdf>

Original File Name: 20180703\_CARB\_POLB\_Comment Letter\_JMM.pdf

Date and Time Comment Was Submitted: 2018-07-03 09:57:26

No Duplicates.

## **Comment 7 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Kawsar

Last Name: Vazifdar

Email Address: kvazifdar@dpw.lacounty.gov

Affiliation: LA County Solid Waste Management Committ

Subject: Comments on Staff's Modification to the Proposed 2018 Amendments to the LCFS Regulation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/191-lcfs18-VydSJgNtV3QAaQV2.pdf>

Original File Name: Proposed 2018 LCFS Amendments 07.02.18.pdf

Date and Time Comment Was Submitted: 2018-07-03 11:35:11

No Duplicates.

## **Comment 8 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Ralph

Last Name: Moran

Email Address: ralph.moran@bp.com

Affiliation:

Subject: LCFS 15-Day Package

Comment:

BP America Comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/192-lcfs18-UzFVI1wCUWEGbwhl.pdf>

Original File Name: BP comments to CARB 15-day package.pdf

Date and Time Comment Was Submitted: 2018-07-03 12:30:56

No Duplicates.

## **Comment 9 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Philip

Last Name: Guillemette

Email Address: philip.guillemette@fhr.com

Affiliation: Flint Hills Resources

Subject: Comments to Notice of Public Availability of Modified Text and Additional Documents

Comment:

Attached please find Flint Hills Resources' comments to the Notice of Public Availability of Modified Text and Availability of Additional Documents and Information to the Proposed Amendments to the LCFS and ADF regulations.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/193-lcfs18-AGYCbAR3Ul5QZ1Vg.pdf>

Original File Name: FHR 15-day Comments.pdf

Date and Time Comment Was Submitted: 2018-07-03 12:39:30

No Duplicates.

## **Comment 10 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Bang

Last Name: Phung

Email Address: bang.phung@ladwp.com

Affiliation: Los Angeles DWP

Subject: LADWP Comments on LCFS 15-Day Modification

Comment:

See attachment for comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/194-lcfs18-AjVUfwQ2B3lXYFdv.pdf>

Original File Name: 7-3-18 LADWP Comments for 15-Day Modification of Proposed Amendments of the LCFS Regulation Final.pdf

Date and Time Comment Was Submitted: 2018-07-03 13:35:59

No Duplicates.

## **Comment 11 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: elizabeth.bourbon@valero.com

Affiliation: Valero

Subject: Comments of the Valero Companies

Comment:

Attached please find comments submitted on behalf of Valero. If you have any questions, please contact me or my colleague, Elizabeth Hepp. Thanks for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/195-lcfs18-VmQFMwExVj0HXgMz.pdf>

Original File Name: 2018 07-03 LCFS 15-day comments-VLO.pdf

Date and Time Comment Was Submitted: 2018-07-03 13:42:58

No Duplicates.

## **Comment 12 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Elizabeth

Last Name: Bourbon

Email Address: elizabeth.bourbon@valero.com

Affiliation: Diamond Green Diesel

Subject: Comments of Diamond Green Diesel LLC

Comment:

Attached please find comments submitted on behalf of Diamond Green Diesel, LLC. If you have any questions, please do not hesitate to contact me or my colleague, Elizabeth Hepp. Thanks for your consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/196-lcfs18-ADIHMV1tUjlWD1Rk.pdf>

Original File Name: 2018 07-03 LCFS 15-day comments-DGD.pdf

Date and Time Comment Was Submitted: 2018-07-03 13:47:16

No Duplicates.

## **Comment 13 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Kathleen

Last Name: Van Osten

Email Address: [kvo@mvmstrategy.com](mailto:kvo@mvmstrategy.com)

Affiliation:

Subject: lcfs18 -- 15-day notice

Comment:

Please see the attached letter from United Airlines.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/197-lcfs18-VyJUPFw0AyRRMIUx.docx>

Original File Name: United Letter LCFS 2018-7-2.docx

Date and Time Comment Was Submitted: 2018-07-03 14:00:11

No Duplicates.

## **Comment 14 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Thomas

Last Name: Jelenic

Email Address: [tjelenic@pmsaship.com](mailto:tjelenic@pmsaship.com)

Affiliation: PMSA

Subject: Comment on 15-Day Notice to the Low Carbon Fuel Standard Regulation Amendments

Comment:

Please find PMSA's comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/199-lcfs18-AnJXPF0vVWcBWFQ3.pdf>

Original File Name: PMSA Comment LCFS 15-Day Notice 7-3-18.pdf

Date and Time Comment Was Submitted: 2018-07-03 16:08:00

No Duplicates.

## **Comment 15 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Nancy

Last Name: Young

Email Address: [nyoung@airlines.org](mailto:nyoung@airlines.org)

Affiliation: Airlines for America (A4A)

Subject: Airlines for America (A4A) Comments on 15-Day Notice LCFS Regulation Revisions

Comment:

Please see attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/200-lcfs18-UDFRY1w8U14FYARr.pdf>

Original File Name: A4A Comments on 15-day Notice LCFS Revisions 7-5-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 08:54:06

No Duplicates.

**Comment 16 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Brian

Last Name: Bonner

Email Address: Non-web submitted comment

Affiliation: Air Products

Subject: Air Products comments on LCFS18

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/201-lcfs18-VTQHaFckVloGcFAi.pdf>

Original File Name: Air Products Comments on LCFS18.pdf

Date and Time Comment Was Submitted: 2018-07-05 09:21:36

No Duplicates.

## **Comment 17 for LCFS 2018 (lcfs18) - 15-1.**

First Name: William

Last Name: Elrick

Email Address: [belrick@cafcp.org](mailto:belrick@cafcp.org)

Affiliation:

Subject: Industry comments to ARB on HRI pathway

Comment:

Please accept these comments regarding the Hydrogen Refueling Infrastructure (HRI) pathway as proposed by the California Air Resources Board in the 15-day Notice.

Please contact me or any of the signatories if there are any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/202-lcfs18-AGwCZwFmBCRSCwJq.pdf>

Original File Name: LCFS HRI - 15 Day Comments to Docket.pdf

Date and Time Comment Was Submitted: 2018-07-05 09:39:08

No Duplicates.

## **Comment 18 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Steven

Last Name: Douglas

Email Address: [sdouglas@autoalliance.org](mailto:sdouglas@autoalliance.org)

Affiliation: Alliance of Automobile Manufacturer

Subject: Automaker Comments on - LCFS 15-Day Notice

Comment:

The Alliance of Automobile Manufacturers and Association of Global Automakers appreciate the opportunity to submit the attached comments on the 15-Day Notice changes to the Low Carbon Fuel Standard (LCFS) Regulation.

Best regards,  
Steve

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/203-lcfs18- VTQBclInUGxXPARI.pdf>

Original File Name: Automaker 15-Day Notice LCFS Comments.pdf

Date and Time Comment Was Submitted: 2018-07-05 11:11:54

No Duplicates.

## **Comment 19 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Catherine  
Last Name: Reheis-Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA comments on the ARB Proposed 15-day Modifications to the Low Carbon Fuel Standard Reg

Comment:

Please see attached WSPA comments on the ARB Proposed 15-day Modifications to the Low Carbon Fuel Standard Regulation Amendments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/204-lcfs18-B3BSJ1UkADJWD1c0.pdf>

Original File Name: WSPA Comment Letter\_ LCFS\_07\_05\_2018\_final.pdf

Date and Time Comment Was Submitted: 2018-07-05 11:33:01

No Duplicates.

## **Comment 20 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Aidan

Last Name: Renaghan

Email Address: aidan.renaghan@dteenergy.com

Affiliation: DTE Biomass Energy

Subject: DTE Comments on LCFS 15 Day Amendments

Comment:

Attached please find DTE's comment letter on the 15-day LCFS Amendment package. Please do not hesitate to reach out for any questions or clarifications around these comments.

Best,  
Aidan Renaghan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/205-lcfs18-BmJWJFcxBQkGbAZl.pdf>

Original File Name: DTE LCFS 15 Day Amendments Comment FINAL.pdf

Date and Time Comment Was Submitted: 2018-07-05 12:11:17

No Duplicates.

## **Comment 21 for LCFS 2018 (lcfs18) - 15-1.**

First Name: John  
Last Name: Sens  
Email Address: jsens@ecoengineers.us  
Affiliation: EcoEngineers

Subject: EcoEngineers Comments on Proposed Amendments to the LCFS Regulation  
Comment:

Dear Chair Nichols,

EcoEngineers would like to thank the California Air Resources Board for the opportunity to provide comments on the proposed Low Carbon Fuel Standard draft regulation. We are excited to be a part of the process and have prepared the following comments for your consideration.

Our comment letter is attached and we are available for further discussion if there are any questions.

John Sens  
Regulatory Consultant  
EcoEngineers

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/206-lcfs18-UiBSMQZgU3UBawNi.pdf>

Original File Name: Regulatory Changes Letter\_07.05.18\_final.pdf

Date and Time Comment Was Submitted: 2018-07-05 12:20:10

No Duplicates.

## **Comment 22 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Kim

Last Name: Do

Email Address: [kdo@white-energy.com](mailto:kdo@white-energy.com)

Affiliation: White Energy, Inc

Subject: 15 Day Comments

Comment:

Comments related to CCS protocol/buffer account attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/207-lcfs18-AmEFYgBzWGIVDARn.pdf>

Original File Name: CARB Comments 15 day Package July 5th 2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 12:52:07

No Duplicates.

## **Comment 23 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Graham  
Last Name: Noyes  
Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
Affiliation: Noyes Law Corporation

Subject: LCFS18- Kore Comment RE: Innovative Crude  
Comment:

Dear Clerk of the Board,

Attached please find a comment regarding the innovative crude provision in the proposed Low Carbon Fuel Standard regulations. This comment is submitted on behalf of my client, Kore Infrastructure.

Please contact me if there are any questions or issues relating to the comment. Thank you for your assistance.

Best Regards,

Graham

Graham Noyes  
Noyes Law Corporation  
401 Spring Street, Suite 205  
Nevada City, CA 95959  
[www.fuelandcarbonlaw.com](http://www.fuelandcarbonlaw.com)

(530)264-7157 Direct  
(206)856-8784 Cell  
[graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
<https://www.linkedin.com/in/grahamnoyes>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/209-lcfs18-UTpVPAZ1V2FXDgZl.pdf>

Original File Name: Kore Comment RE LCFS Innovative Crude 5 July 2018 v2.pdf

Date and Time Comment Was Submitted: 2018-07-05 13:09:13

No Duplicates.

## **Comment 24 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Graham  
Last Name: Noyes  
Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
Affiliation: Noyes Law Corporation

Subject: LCFS18- Fulcrum BioEnergy Comment RE: Organics Diversion  
Comment:

Dear Clerk of the Board,

Attached please find a comment regarding the diversion of organics from landfills in the proposed Low Carbon Fuel Standard regulations.

This comment is submitted on behalf of my client, Fulcrum BioEnergy, Inc.

Please contact me if there are any questions or issues relating to the comment. Thank you for your assistance.

Best Regards,

Graham

Graham Noyes  
Noyes Law Corporation  
401 Spring Street, Suite 205  
Nevada City, CA 95959  
[www.fuelandcarbonlaw.com](http://www.fuelandcarbonlaw.com)

(530)264-7157 Direct  
(206)856-8784 Cell  
[graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
<https://www.linkedin.com/in/grahamnoyes>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/210-lcfs18-WjxRIIE8VGQKflUg.pdf>

Original File Name: Fulcrum Comment RE CI for Avoided Methane 5 July 2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 13:22:14

No Duplicates.

**Comment 25 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Matthew

Last Name: Hodges

Email Address: Non-web submitted comment

Affiliation: Diamond Green Diesel

Subject: Diamond Alternative Energy Comments on the Proposed Amendments to the LCFS 15 Day Package

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/213-lcfs18-UDRdMgFhUmwGbNt.pdf>

Original File Name: Diamond Alternative Energy comments, LCFS 15 Day Package Comments 7-5-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 13:42:41

No Duplicates.

**Comment 26 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Kevin

Last Name: Maggay

Email Address: kmaggay@semprautilities.com

Affiliation: SoCalGas

Subject: LCFS Amendments Modified Language Comments

Comment:

Attached is SoCalGas' comments to the Modified LCFS Language.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/214-lcfs18-WygCZ1M1WFQLYVU2.pdf>

Original File Name: SCG LCFS Comments July 5.pdf

Date and Time Comment Was Submitted: 2018-07-05 13:44:12

No Duplicates.

**Comment 27 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Matthew

Last Name: Hodges

Email Address: Non-web submitted comment

Affiliation: Valero

Subject: Valero Comments on the Proposed Amendments to the Low Carbon Fuel Standard 15 Day Package

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/215-lcfs18-ViBQN1E8BzFVIQlm.pdf>

Original File Name: Valero Comments.pdf

Date and Time Comment Was Submitted: 2018-07-05 13:47:57

No Duplicates.

**Comment 28 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: Comments on LCFS Notice of Public Availability of Modified Text

Comment:

please see attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/217-lcfs18-AndSN1MhAg5SNwlm.pdf>

Original File Name: UCS comments on 15 day changes July 5 2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:03:45

No Duplicates.

## **Comment 29 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Graham  
Last Name: Noyes  
Email Address: [graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
Affiliation: Noyes Law Corporation

Subject: LCFS18- Alternative Jet Fuel Producer Comment

Comment:

Dear Clerk of the Board,

Attached please find a comment regarding the alternative jet fuel provisions in the proposed Low Carbon Fuel Standard regulations. This comment is submitted on behalf of my clients AltAir Fuels, Fulcrum BioEnergy, Neste, Red Rock Biofuels and Velocys.

Please contact me if there are any questions or issues relating to the comment. Thank you for your assistance.

Best Regards,

Graham

Graham Noyes  
Noyes Law Corporation  
401 Spring Street, Suite 205  
Nevada City, CA 95959  
[www.fuelandcarbonlaw.com](http://www.fuelandcarbonlaw.com)

(530)264-7157 Direct  
(206)856-8784 Cell  
[graham@noyeslawcorp.com](mailto:graham@noyeslawcorp.com)  
<https://www.linkedin.com/in/grahamnoyes>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/218-lcfs18-WjtSPIUyAg4AdgFz.pdf>

Original File Name: AJF Producer Draft 15 Day Comments to ARB LCFS 5 July 2018 .pdf

Date and Time Comment Was Submitted: 2018-07-05 14:15:20

No Duplicates.

## **Comment 30 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Geoff

Last Name: Cooper

Email Address: Non-web submitted comment

Affiliation:

Subject: RFA Comments on 15-Day Package

Comment:

Please see attached comments. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/219-lcfs18-AnAGZgRkVFgHYII9.pdf>

Original File Name: RFA Comments July 2018 LCFS 15-Day.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:26:32

No Duplicates.

## **Comment 31 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Greg

Last Name: Kester

Email Address: [gkester@casaweb.org](mailto:gkester@casaweb.org)

Affiliation: California Assoc of Sanitation Agencies

Subject: Comments on Proposed Changes to LCFS Program

Comment:

Please find attached comments from the California Association of Sanitation Agencies (CASA) on the proposed revisions to the Low Carbon Fuel Standard regulations. Please feel free to contact me with any questions or for further clarification.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/220-lcfs18-U2RTeF1pUiwFMgkx.pdf>

Original File Name: 7-5-18 CASA Comments on LCFS Proposed changes.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:04:19

No Duplicates.

## **Comment 32 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Andrew

Last Name: Mayer

Email Address: [amayer@winston.com](mailto:amayer@winston.com)

Affiliation: Winston & Strawn, LLP

Subject: BART Comments on LCFS 15-Day Changes

Comment:

Dear Clerk of the Board,

Attached, please find comments from the San Francisco Bay Area Rapid Transit District (BART) on staff's proposed changes to the LCFS regulation, as modified by staff's 15-day rulemaking package.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/221-lcfs18-BmRQN1wvUXZRCANg.pdf>

Original File Name: BART Comments on LCFS 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:31:12

No Duplicates.

**Comment 33 for LCFS 2018 (lcfs18) - 15-1.**

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

## **Comment 34 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Geoffrey

Last Name: Holmes

Email Address: [gholmes@carbonengineering.com](mailto:gholmes@carbonengineering.com)

Affiliation: Carbon Engineering

Subject: Comments on 2018 Amendments

Comment:

CE is pleased to submit the following comments on the 2018 LCFS amendments, in particular on the CCS Protocol.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/223-lcfs18-ADJTZQMzBW5QCQQ0.pdf>

Original File Name: 2018 07 05 - LCFS Amendments CE Response.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:41:20

No Duplicates.

**Comment 35 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Michael  
Last Name: Boccadoro  
Email Address: mboccadoro@westcoastadvisors.com  
Affiliation: Agricultural Energy Consumers Associatio

Subject: Comments of AECA on Proposed Amendments LCFS Regulation  
Comment:

please see the attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/224-lcfs18-WjsGZVIwAjALUIU2.pdf>

Original File Name: AECA COMMENTS on amendments to LCFS 7-05-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:06:16

No Duplicates.

**Comment 36 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Amanda

Last Name: Black

Email Address: Non-web submitted comment

Affiliation: Iogen Corporation

Subject: Comments on LCFS Proposed Amendments

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/225-lcfs18-WjNUPldnBQkHaM0d.pdf>

Original File Name: Iogen Comments on LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:47:29

No Duplicates.

**Comment 37 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Myles

Last Name: Culhane

Email Address: [myles\\_culhane@oxy.com](mailto:myles_culhane@oxy.com)

Affiliation: Occidental Petroleum

Subject: Comments to the LCFS Protocol Version Dated 070518

Comment:

Please see the attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/228-lcfs18-B2gAZQdlVW8KaARh.pdf>

Original File Name: Occidental Comments to CARB CCS Protocol (070518).pdf

Date and Time Comment Was Submitted: 2018-07-05 14:41:28

No Duplicates.

## **Comment 38 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Leticia  
Last Name: Phillips  
Email Address: leticia@unica.com.br  
Affiliation: Brazilian Sugarcane Industry Association

Subject: UNICA's Comments to CARB

Comment:

Please see attached UNICA's comments to the Board on the proposed amendments to the LCFS.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/229-lcfs18-VT9VJIU4UHoBWAcy.pdf>

Original File Name: July 5 Comments to Carb.pdf

Date and Time Comment Was Submitted: 2018-07-05 14:52:38

No Duplicates.

**Comment 39 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Anthony  
Last Name: Harrison  
Email Address: anthony.harrison@chargepoint.com  
Affiliation: ChargePoint

Subject: Comments of ChargePoint on LCFS Proposed Amendments  
Comment:

Please find that attached comments from ChargePoint on the Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/230-lcfs18-WjlXOVw8V3YDYIUw.pdf>

Original File Name: ChargePoint LCFS comments\_07052018\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:16:36

No Duplicates.

**Comment 40 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Alex

Last Name: Dell

Email Address: alex@maasenergy.com

Affiliation: Maas Energy Works

Subject: Comments for Board Item LCFS 18

Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/231-lcfs18-AG1RNgZmUHBRCFU2.pdf>

Original File Name: MAAS Comments on June 20 LCFS changes (FINAL).pdf

Date and Time Comment Was Submitted: 2018-07-05 15:21:01

No Duplicates.

**Comment 41 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Jessica  
Last Name: Hoffmann  
Email Address: [jwhoffmann@rpgllc.com](mailto:jwhoffmann@rpgllc.com)  
Affiliation: RPMG, Inc.

Subject: 15-day Package Comments

Comment:

Attached are RPMG's LCFS 15-day package comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/232-lcfs18-WihWIFc7UWVWDwBs.pdf>

Original File Name: RPMG LCFS 15-day Comment Letter 7-5-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:24:09

No Duplicates.

**Comment 42 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Tim

Last Name: Morillo

Email Address: [sgonzales@calgren.com](mailto:sgonzales@calgren.com)

Affiliation: Calgren Renewable Fuels

Subject: Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

Comments are in the enclosed attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/233-lcfs18-VTZcOwFsVGBRJQFk.pdf>

Original File Name: Calgren Comments of Proposed LCFS Amendments 7-5-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:24:00

No Duplicates.

**Comment 43 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Rock

Last Name: Zierman

Email Address: Rock@cipa.org

Affiliation: CIPA

Subject: CIPA Comments on LCFS 15-day package

Comment:

Please find CIPA's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/234-lcfs18-UTJSPVAhBDYGX1c7.pdf>

Original File Name: CIPA LCFS 15-day Comments-final.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:28:37

No Duplicates.

## **Comment 44 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Scott

Last Name: hedderich

Email Address: scott.hedderich@regi.com

Affiliation: REG

Subject: comments on the proposed LCFS related amendments

Comment:

please see our attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/235-lcfs18-AmEBZlAjAzIBWAFi.pdf>

Original File Name: CARB comments 7.7.2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:23:50

No Duplicates.

## **Comment 45 for LCFS 2018 (lcfs18) - 15-1.**

First Name: David  
Last Name: Schlosberg  
Email Address: [david@emotorwerks.com](mailto:david@emotorwerks.com)  
Affiliation: eMotorWerks

Subject: LCFS 15 Day Comment Period Filing  
Comment:

Attached please find the comments of Electric Motor Werks, Inc., on the Proposed 15 Day Modifications to the Low Carbon Fuel Standard Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/236-lcfs18-UT1XMgBnUHALUgdk.pdf>

Original File Name: LCFS Comments eMotorWerks 5 July 2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:45:13

No Duplicates.

**Comment 46 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Nina

Last Name: Kapoor

Email Address: nina@rngcoalition.com

Affiliation: Coalition for Renewable Natural Gas

Subject: Proposed Modifications to the Low Carbon Fuel Standard Regulation

Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/237-lcfs18-VSdWPIE3BDRQCQBk.docx>

Original File Name: RNGC Draft LCFS Comments 15 Day.docx

Date and Time Comment Was Submitted: 2018-07-05 15:48:17

No Duplicates.

## **Comment 47 for LCFS 2018 (lcfs18) - 15-1.**

First Name: John  
Last Name: Thornton  
Email Address: john@CleanFuture.us  
Affiliation: CleanFuture, Inc.

Subject: LCFS18 - Electric Transport Refrigeration Unit (eTRU) Comment  
Comment:

Dear Clerk of the Board,

Attached please find a comment regarding the electric transport refrigeration units in the proposed Low Carbon Fuel Standard regulations.

Please contact me if there are any questions or issues relating to the comment. Thank you for your assistance.

Best Regards,

John

John A. Thornton  
President

CleanFuture, Inc.  
(503) 806-1760 (mobile)  
(503) 427-1968 (direct)  
P.O. Box 23813  
Portland, Oregon 97281-3813 USA  
john@CleanFuture.us

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/238-lcfs18-UjEAagRgAjBROQBm.pdf>

Original File Name: CleanFuture comments regarding eTRU for LCFS 5 July 2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 15:57:03

No Duplicates.

**Comment 48 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Ilia

Last Name: Florentin

Email Address: [ilia.florentin@wonderful.com](mailto:ilia.florentin@wonderful.com)

Affiliation: The Wonderful Company

Subject: Comments in Response to June 11, 2018 LCFS Workshop and Draft Regulation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/239-lcfs18-UzACa1c7WWdRMgRq.pdf>

Original File Name: Comment Letter - LCFS Rulemaking\_July 5 2018\_Final.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:00:49

No Duplicates.

## **Comment 49 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Simon

Last Name: Mui

Email Address: [smui@nrdc.org](mailto:smui@nrdc.org)

Affiliation:

Subject: NRDC Comments on LCFS 15-Day Changes

Comment:

Attached, please find comments related to the HCI and FCI provisions. Thank you for the opportunity to provide feedback.

Simon Mui  
Senior Scientist  
NRDC

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/240-lcfs18-AGxcOQBnBCQDWIIx.pdf>

Original File Name: LCFS Comments\_NRDC - 15 day changes.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:03:59

No Duplicates.

## **Comment 50 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Jon  
Last Name: Walker  
Email Address: [jonwalker@lyft.com](mailto:jonwalker@lyft.com)  
Affiliation: Lyft

Subject: Lyft Comment on LCFS

Comment:

Please see our attached pdf containing our comments on this proceeding.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/241-lcfs18-BzUFM1NjWTIAKAK5.pdf>

Original File Name: 2018.07.05 Lyft Public Comments on LCFS.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:09:06

No Duplicates.

## **Comment 51 for LCFS 2018 (lcfs18) - 15-1.**

First Name: James

Last Name: Hendry

Email Address: [jhendry@sfwater.org](mailto:jhendry@sfwater.org)

Affiliation: City and County of San Francisco

Subject: Comments on Proposed Amendments to the LCFS Regulation

Comment:

For any questions concerning the attached comments, please contact James Hendry, Regulatory and Legislative Affairs for the San Francisco Public Utilities Commission, at (415)554-1526 or at [jhendry@sfwater.org](mailto:jhendry@sfwater.org).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/242-lcfs18-BWYHYlwuAzYDWgFt.doc>

Original File Name: CCSF LCFS comments 7-5.doc

Date and Time Comment Was Submitted: 2018-07-05 16:03:34

No Duplicates.

## **Comment 52 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Todd

Last Name: Campbell

Email Address: Todd.Campbell@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Clean Energy's Comments to the Proposed LCFS Amendments

Comment:

Attached are Clean Energy's comments to the 15 day LCFS amendment package.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/243-lcfs18-AWJQOgRgADIDawFe.pdf>

Original File Name: Clean Energy LCFS Amendment Comment Letter 20180705 ARB.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:10:31

No Duplicates.

## **Comment 53 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Steven  
Last Name: Eisenberg  
Email Address: steven.eisenberg@srectrade.com  
Affiliation: SRECTrade, Inc.

Subject: Comment Submission

Comment:

To whom it may concern,

Please find enclosed comments from SRECTrade, Inc. on the most recent 15 day notice period. Thank you for your time and consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/244-lcfs18-VSZcKF05BzcAclcl.pdf>

Original File Name: SRECTrade Comments to CARB LCFS 2018 Regs\_July 5 2018\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:16:19

No Duplicates.

**Comment 54 for LCFS 2018 (lcfs18) - 15-1.**

First Name: John  
Last Name: O'Donnell  
Email Address: john@glasspoint.com  
Affiliation: GlassPoint Solar

Subject: LCFS Comments  
Comment:

Attached Comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/245-lcfs18-BmFVPwNjVHRRJAd3.pdf>

Original File Name: GlassPoint July 5, 2018 15-day comment letter on LCFS-final.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:17:18

No Duplicates.

## **Comment 55 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Deepika

Last Name: Nagabhushan

Email Address: dnagabhushan@catf.us

Affiliation:

Subject: CATF & NRDC Joint Comments on CCS Protocol 15-Day Modifications

Comment:

Dear Clerk of the Board,

Please find attached joint comments from NRDC and CATF supporting and recommending some additional modifications to the proposed CCS Protocol.

Thank you,  
Deepika Nagabhushan  
Energy Policy Associate  
Clean Air Task Force

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/246-lcfs18-VDcHYlwuUnFWIIM8.pdf>

Original File Name: CCSProtocol\_15Day comments\_July5\_CATF\_and\_NRDC.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:27:33

No Duplicates.

## **Comment 56 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Chris

Last Name: Bliley

Email Address: [cbliley@growthenergy.org](mailto:cbliley@growthenergy.org)

Affiliation: Growth Energy

Subject: Growth Energy's Comments on 15-Day Notice

Comment:

Please see the attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/247-lcfs18-BmFdKVV4ByMAcgBo.pdf>

Original File Name: Growth Energy, July 5, 2018, Comments on 15-Day Notice (00879863-2).pdf

Date and Time Comment Was Submitted: 2018-07-05 16:26:56

No Duplicates.

## **Comment 57 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Michael

Last Name: Carr

Email Address: Michael.Carr@shell.com

Affiliation: Shell

Subject: Shell comments to CARB regarding the 15-day Notice of Proposed Amendments to the LCFS

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/248-lcfs18-AnFSPAdjAzwKYFUK.pdf>

Original File Name: Shell Comments LCFS 15 day package of June 20 2018.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:31:51

No Duplicates.

**Comment 58 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Joy

Last Name: Alafia

Email Address: joy@westernpga.org

Affiliation:

Subject: 15-Day Comment Period - LCFS

Comment:

Please reference uploaded file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/249-lcfs18-UzkFdgdqBy0DWgQx.pdf>

Original File Name: July 5 2018 Letter to Sam Wade\_GNA Final submitted 7\_5\_18.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:36:48

No Duplicates.

## **Comment 59 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Thomas  
Last Name: Lawson  
Email Address: thomas@cngvc.org  
Affiliation:

Subject: CNGVC Comments on LCFS Proposed Changes

Comment:

Attached are our comments.

Thomas Lawson  
CNGVC President

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/250-lcfs18-AGNWPlUzVnMAZVcI.pdf>

Original File Name: CNGVC Comment Letter on LCFS Changes 7.5.18.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:38:20

No Duplicates.

## **Comment 60 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Eileen

Last Name: Tutt

Email Address: [eileen@caletc.com](mailto:eileen@caletc.com)

Affiliation: CalETC

Subject: LCFS18 Item 18-3-3 Comments 15-day modifications

Comment:

Please consider the attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/251-lcfs18-AGMHYFE8UWdXJQFi.pdf>

Original File Name: CalETC Comment Letter LCFS 15-day changes Final 070518.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:42:43

No Duplicates.

## **Comment 61 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Neal  
Last Name: Reardon  
Email Address: [nreardon@sonomacleanpower.org](mailto:nreardon@sonomacleanpower.org)  
Affiliation:

Subject: The Smart EV Charging Coalition Comments on the Proposed Amendments to the LCFS Regulation

Comment:

Dear Clerk of the Board,

Sonoma Clean Power Authority, on behalf of the Smart EV Charging Coalition, provide the following comments on the June 30, 2018 Proposed Amendments to the Low Carbon Fuel Standard Regulation.

Sincerely,

Neal Reardon  
Director, Regulatory Affairs  
Sonoma Clean Power Authority  
On behalf of the Smart EV Charging Coalition

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/252-lcfs18-ADFRb1NiAGRSZAM2.pdf>

Original File Name: 180705\_Smart EV Charging Group LCFS Comments (00446718xBA8E1).pdf

Date and Time Comment Was Submitted: 2018-07-05 16:40:02

No Duplicates.

## **Comment 62 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Sara

Last Name: Rafalson

Email Address: sara.rafalson@evgo.com

Affiliation: EVgo

Subject: RE: Proposed Amendments to the Low Carbon Fuel Standard Regulation (LCFS18)

Comment:

Mr. Wade,

EVgo is grateful for the leadership of the California Air Resources Board (CARB) as it relates to transportation electrification. EVgo thanks CARB staff for the opportunity to provide input on this rulemaking, and please do not hesitate to contact us if we can answer any additional questions or be of further assistance.

Best,  
Sara

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/253-lcfs18-UiJXIwNtBCcKY1Um.pdf>

Original File Name: Proposed Amendments to the Low Carbon Fuel Standard Regulation (LCFS18).pdf

Date and Time Comment Was Submitted: 2018-07-05 16:49:18

No Duplicates.

## **Comment 63 for LCFS 2018 (lcfs18) - 15-1.**

First Name: William

Last Name: Westerfield

Email Address: William.Westerfield@smud.org

Affiliation: SMUD

Subject: SMUD Comments on Proposed 15-day Modifications to the Pending Amendments to the Low Carbon

Comment:

Please see SMUD's attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/254-lcfs18-VztWNVcxVSsDNwU1.pdf>

Original File Name: LEG-2018-0359-SMUD-Comments-15-day-Mods-LCFS.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:50:00

No Duplicates.

**Comment 64 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: Pacific Gas & Electric

Subject: PG&E Comments on June 15-Day LCFS Regulatory Text

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/255-lcfs18-AnJcPQRgBAGFbwBj.pdf>

Original File Name: PGE LCFS 15-1 Comments\_7-5-18.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:51:12

No Duplicates.

## **Comment 65 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Colin

Last Name: Murphy

Email Address: colin.murphy@nextgenpolicy.org

Affiliation: NextGen Policy Center

Subject: NextGen Comment on LCFS Modified Text

Comment:

Please find attached NextGen's comment on the Modified text, along with a model of credit generation from HRI and FCI pathways, as well as an explanatory memo relating to the model.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/256-lcfs18-AmxcPwd+ByADYIUw.zip>

Original File Name: NextGen July 5 submission.zip

Date and Time Comment Was Submitted: 2018-07-05 16:40:57

No Duplicates.

**Comment 66 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Adam

Last Name: Langton

Email Address: adam.langton@bmwna.com

Affiliation: BMW of North America, LLC

Subject: BMWNA comments on CARB 15-day modifications to LCFS

Comment:

PDF of comments is attached below.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/257-lcfs18-UDICaVAmBDIWMQNc.pdf>

Original File Name: BMWNA\_LCFS\_COMMENTS\_20180705.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:52:37

No Duplicates.

**Comment 67 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Andrew

Last Name: Craig

Email Address: acraig@calbioenergy.com

Affiliation:

Subject: CalBio Comments on LCFS 15-Day Proposed Amendments

Comment:

Please find CalBio's comments to the LCFS program attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/258-lcfs18-UTJWMQdqAzIGaQVq.pdf>

Original File Name: CalBio-Revisions to LCFS Comments July 2018 Final.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:55:31

No Duplicates.

## **Comment 68 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Love

Last Name: Goyal

Email Address: [goyal@lifecycleassociates.com](mailto:goyal@lifecycleassociates.com)

Affiliation: Life Cycle Associates, LLC

Subject: Commingling accounting true-up

Comment:

Our comments relate to the verification and accounting of the commingling pathways.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/259-lcfs18-Uj5TNlMzBQkHLFIN.pdf>

Original File Name: LCA\_-\_Commingling\_comment.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:48:19

No Duplicates.

## **Comment 69 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Fei

Last Name: Chi

Email Address: fchi@tesla.com

Affiliation:

Subject: Comments to 1st 15-Day Notice for 2018 LCFS Amendments

Comment:

Please find our comments attached. Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/260-lcfs18-ATNUYldnBG8DNQYx.pdf>

Original File Name: 20180705 Final Tesla Comments to 1st 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2018-07-05 16:58:38

No Duplicates.

**Comment 70 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Will

Last Name: Overly

Email Address: Non-web submitted comment

Affiliation: Bluesource

Subject: Low Carbon Fuel Standard Extension Draft

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/261-lcfs18-VDZUPlwoBzEKf1M8.pdf>

Original File Name: Bluesource\_CA LCFS- 15 Day\_Comments\_07.05.2018.pdf

Date and Time Comment Was Submitted: 2018-07-06 10:33:36

No Duplicates.

## **Comment 71 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Shane

Last Name: Stephens

Email Address: Non-web submitted comment

Affiliation: FirstElement Fuel

Subject: FirstElement's Comments on HRI Pathway

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/262-lcfs18-Wz1TPFckUnIAcglW.pdf>

Original File Name: First Element Comments.pdf

Date and Time Comment Was Submitted: 2018-07-09 15:15:04

No Duplicates.

**Comment 72 for LCFS 2018 (lcfs18) - 15-1.**

First Name: Tom

Last Name: Umenhofer

Email Address: Non-web submitted comment

Affiliation: WSPA

Subject: WSPA Comments on CCS

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/263-lcfs18-Wi1XIIYnU2FQCQRn.pdf>

Original File Name: WSPA Comments.pdf

Date and Time Comment Was Submitted: 2018-07-10 13:27:56

No Duplicates.

## **Comment 1 for LCFS 2018 (lcfs18) - 15-2.**

First Name: David

Last Name: Edwards

Email Address: [david.edwards@airliquide.com](mailto:david.edwards@airliquide.com)

Affiliation: Air Liquide Advanced Business and Techno

Subject: Air Liquide Recommendations for the LCFS Proposed Ammendments

Comment:

Please see our attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/264-lcfs18-WmgBNwAwBW5WfVV1.pdf>

Original File Name: 2018-08-16 AL Letter - LCFS Docket Comments\_v2.pdf

Date and Time Comment Was Submitted: 2018-08-17 10:57:53

No Duplicates.

## **Comment 2 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Charles

Last Name: Purshouse

Email Address: [charles.purshouse@camcocleanenergy.com](mailto:charles.purshouse@camcocleanenergy.com)

Affiliation: Camco International Group, Inc.

Subject: LCFS 15-day change comments

Comment:

The data in Table A.4. in the References Tables for the Livestock GREET Tool is pretty out of date. The EPA typically release updated defaults every year in April in their annual GHG Inventory. Their latest release is here:

[https://www.epa.gov/sites/production/files/2018-01/documents/2018\\_annex\\_3\\_-part\\_b.pdf](https://www.epa.gov/sites/production/files/2018-01/documents/2018_annex_3_-part_b.pdf)

(see Table A-185) - you will need to convert to kg/day/1000kg of animal mass. Seems they have changed these updates to every two years with the next one due to come out in April 2019. Wanted to pass on to see if you could update these given that the GREET Tool may not be updated until the early 2020s by which time the defaults might be 10 years out of date.

Charles

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-08-20 12:15:38

No Duplicates.

**Comment 3 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Tim

Last Name: Dixon

Email Address: tim.dixon@ieaghg.org

Affiliation: IEAGHG

Subject: LCFS CCS Protocol - PISC Period

Comment:

Please see attached submission.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/266-lcfs18-B25SMQFhU2cAbgBn.pdf>

Original File Name: IEAGHG submission on LCFS.pdf

Date and Time Comment Was Submitted: 2018-08-22 07:01:35

No Duplicates.

## **Comment 4 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Nicholas

Last Name: Blair

Email Address: [nblair@scppa.org](mailto:nblair@scppa.org)

Affiliation: Southern California Public Power Authori

Subject: SCPPA LCFS POP Comments

Comment:

To whom it may concern,

Please see the attached comment letter regarding the LCFS POP.

Thank you,

Nicholas Blair

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/267-lcfs18-W2MAKwc0UDAFLgMx.pdf>

Original File Name: 8-23-2018 SCPPA LCFS POP Comments.pdf

Date and Time Comment Was Submitted: 2018-08-23 08:40:13

No Duplicates.

## **Comment 5 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Stefan

Last Name: Unnash

Email Address: UNNASCH@LIFECYCLEASSOCIATES.COM

Affiliation: Life Cycle Associates, LLC

Subject: Electric vehicle Carbon Intensity

Comment:

Please refer to the attached file for our comments. Thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/268-lcfs18-VTlcOVY2VloFLglW.pdf>

Original File Name: LCA\_-\_Electric vehicle comment.pdf

Date and Time Comment Was Submitted: 2018-08-23 16:36:11

No Duplicates.

## **Comment 6 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Ben

Last Name: Xiong

Email Address: [bxiong@cafcp.org](mailto:bxiong@cafcp.org)

Affiliation:

Subject: LCFS HRI - 15 Day Comments to Docket

Comment:

Please find attached comments on behalf of Air Liquide, FirstElement Fuel, American Honda Motor Co, Inc., Hyundai Kia America Technical Center, Inc., Linde LLC, Mercedes-Benz Research & Development North America, Inc., NEL Hydrogen A/S, Shell New Energies, Toyota Motor North America, United Hydrogen, California Hydrogen Business Council, Energy Independence Now.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/269-lcfs18-UT0FYFE2U3NVDAFp.pdf>

Original File Name: LCFS HRI - 15 Day Comments to Docket.pdf

Date and Time Comment Was Submitted: 2018-08-24 11:20:57

No Duplicates.

## **Comment 7 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Ben

Last Name: Xiong

Email Address: [bxiong@cafcp.org](mailto:bxiong@cafcp.org)

Affiliation:

Subject: LCFS HRI - 15 Day Comments to Docket

Comment:

Updated.

Please find attached comments on behalf of Air Liquide, FirstElement Fuel, American Honda Motor Co, Inc., Hyundai Kia America Technical Center, Inc., Linde LLC, Mercedes-Benz Research & Development North America, Inc., NEL Hydrogen A/S, Shell New Energies, Toyota Motor North America, United Hydrogen, California Hydrogen Business Council, Energy Independence Now.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/270-lcfs18-UDxRNF06AiILUgRs.pdf>

Original File Name: LCFS HRI - 15 Day Comments to Docket.pdf

Date and Time Comment Was Submitted: 2018-08-24 11:49:46

No Duplicates.

**Comment 8 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Mike

Last Name: Mohajer

Email Address: MikeMohajer@yahoo.com

Affiliation: Los Angeles County Waste Mgmt Task Force

Subject: Comments on the Proposed Amendments to the Low Carbon Fuel Standard Regulation

Comment:

See attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/271-lcfs18-ViZRJVA+UnFQOVck.pdf>

Original File Name: Proposed 2018 LCFS Amendments 08.28.18.pdf

Date and Time Comment Was Submitted: 2018-08-28 12:52:17

No Duplicates.

## **Comment 9 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Boketsu

Last Name: Banganganda Bonald

Email Address: portable@arb.ca.gov

Affiliation: clerk of the Board

Subject: assistance financial package.

Comment:

hello,

Your applicant full name Boketsu with my spouse name Mengi mulandu  
esperance ask partners If I can to received employment and to join  
the distinguished groups students at UC san diego/dpt of economics  
tel;+18585342230 and arrival before august 30,2018.

Sincerely,

MR Boketsu Banganganda bonald

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-08-29 03:13:46

No Duplicates.

## **Comment 10 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Kari

Last Name: Buttenhoff

Email Address: [kbuttenhoff@christiansoncpa.com](mailto:kbuttenhoff@christiansoncpa.com)

Affiliation: Christianson PLLP

Subject: LCFS Verification Program Comments

Comment:

Please see attached comments on the upcoming verification program section of the proposed amendments submitted on behalf of Christianson PLLP.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/273-lcfs18-WzgGYQR3WGlVDAZl.pdf>

Original File Name: CARB Comments 8.29.18.pdf

Date and Time Comment Was Submitted: 2018-08-29 07:27:45

No Duplicates.

## **Comment 11 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Todd

Last Name: Campbell

Email Address: Todd.Campbell@cleanenergyfuels.com

Affiliation:

Subject: Clean Energy's Comments to Proposed LCFS Amedments

Comment:

Please find Clean Energy's comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/274-lcfs18-UTJVP1E1VmQFbVQL.pdf>

Original File Name: Clean Energy LCFS Amendment Comment Letter 20180830 ARB Final.pdf

Date and Time Comment Was Submitted: 2018-08-29 16:35:14

No Duplicates.

## **Comment 12 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Jens

Last Name: Keiser

Email Address: [Jens.Keiser@hz-inova.com](mailto:Jens.Keiser@hz-inova.com)

Affiliation: Hitachi Zosen Inova

Subject: Hitachi Zosen Inova Comments on Proposed LCFS Regulation

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/275-lcfs18-UjtHYlQhUVRRNM0d.pdf>

Original File Name: HZI LCFS comment letter 8-28-2018.pdf

Date and Time Comment Was Submitted: 2018-08-29 16:42:14

No Duplicates.

## **Comment 13 for LCFS 2018 (lcfs18) - 15-2.**

First Name: James

Last Name: Hendry

Email Address: [jhendry@sfwater.org](mailto:jhendry@sfwater.org)

Affiliation: City and County of San Francisco

Subject: CCSF Comments on 2nd 15-day proposed modifications to LCFS

Comment:

For any questions regarding the attached comments, please feel free to contact James Hendry at (415) 554-1526 or [jhendry@sfwater.org](mailto:jhendry@sfwater.org).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/276-lcfs18-WjITNgByVWALUgU3.doc>

Original File Name: CCSF 2nd 15-day LCFS Comments (FINAL 8-29-18).doc

Date and Time Comment Was Submitted: 2018-08-29 17:10:34

No Duplicates.

**Comment 14 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Pat

Last Name: McDuff

Email Address: pat@californiafueling.com

Affiliation:

Subject: 2018 LCFS Rulemaking Comment

Comment:

Please see our attached comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/277-lcfs18-BmdSIQNIWH4Gc1Ak.pdf>

Original File Name: August 2018 Comment 08.30.18.pdf

Date and Time Comment Was Submitted: 2018-08-30 08:03:44

No Duplicates.

## **Comment 15 for LCFS 2018 (lcfs18) - 15-2.**

First Name: John

Last Name: Duff

Email Address: john@sorghumgrowers.com

Affiliation: National Sorghum Producers

Subject: Comments on the proposed amendments to the LCFS regulation

Comment:

See attached for NSP's comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/278-lcfs18-VmQHMQY2BG8LUIVl.pdf>

Original File Name: 2018\_08\_30\_LCFS.pdf

Date and Time Comment Was Submitted: 2018-08-30 08:00:54

No Duplicates.

**Comment 16 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Bill

Last Name: Magavern

Email Address: Non-web submitted comment

Affiliation: Coalition for Clean Air

Subject: LCFS Comments

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/280-lcfs18-UzBcNQFhUG8LZAN3.pdf>

Original File Name: Coalition for Clean Air Comments.pdf

Date and Time Comment Was Submitted: 2018-08-30 12:04:43

No Duplicates.

**Comment 17 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Tom

Last Name: Willis

Email Address: tom.willis@conestogaenergy.com

Affiliation: Conestoga Energy Partners, LLC

Subject: Comments on the proposed amendments to the LCFS regulation

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/281-lcfs18-VTZTO1Y5U2UEcQB0.pdf>

Original File Name: Conestoga Energy Comments August 2018 LCFS Ammendments.pdf

Date and Time Comment Was Submitted: 2018-08-30 12:05:19

No Duplicates.

## **Comment 18 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Julia

Last Name: Rege

Email Address: [jrege@globalautomakers.org](mailto:jrege@globalautomakers.org)

Affiliation: Association of Global Automakers

Subject: LCFS18 - Clean Fuel Reward

Comment:

Joint comments submitted by the Association of Global Automakers and Alliance of Automobile Manufacturers.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/282-lcfs18-B2JXKQdyWSRQCVIx.pdf>

Original File Name: Ext. Comm. - Comments - 2018 - 08-30 Joint LCFS 2nd 15-Day Changes.pdf

Date and Time Comment Was Submitted: 2018-08-30 12:14:08

No Duplicates.

## **Comment 19 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Aidan

Last Name: Renaghan

Email Address: aidan.renaghan@dteenergy.com

Affiliation: DTE Biomass Energy

Subject: DTE Comments on LCFS 15 Day Amendments

Comment:

Attached please find comments from DTE Biomass Energy for the LCFS 15 Day comments. Please do not hesitate to reach out if you need any additional information or clarification.

Best,  
Aidan Renaghan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/283-lcfs18-UjYBc105UFwBawlq.pdf>

Original File Name: DTE LCFS 15 Day Amendments Comment 8.30.18 FINAL.pdf

Date and Time Comment Was Submitted: 2018-08-30 12:37:35

No Duplicates.

**Comment 20 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Kim

Last Name: Do

Email Address: [kdo@white-energy.com](mailto:kdo@white-energy.com)

Affiliation: White Energy, Inc

Subject: Second 15 Day Comments

Comment:

Please Find Attached Second 15 day comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/284-lcfs18-VzQAZ1QnU2IKUwhr.pdf>

Original File Name: CARB Comments 15 day Package August 30th 2018.pdf

Date and Time Comment Was Submitted: 2018-08-30 12:49:37

No Duplicates.

## **Comment 21 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Myles

Last Name: Culhane

Email Address: myles\_culhane@oxy.com

Affiliation: Occidental

Subject: Comments to LCFS and CCS Protocol

Comment:

Please see our attached comments to the proposed modifications to the LCFS and the CCS Protocol

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/285-lcfs18-WjVWMwNhAzkDYVI3.docx>

Original File Name: Occidental CARB LCFS and CCS Protocol Version Date 081318 (submitted 083018).docx

Date and Time Comment Was Submitted: 2018-08-30 13:16:29

No Duplicates.

## **Comment 22 for LCFS 2018 (lcfs18) - 15-2.**

First Name: John  
Last Name: Sens  
Email Address: jsens@ecoengineers.us  
Affiliation: EcoEngineers

Subject: Comments on Proposed LCFS Regulation

Comment:

Dear CARB Staff,

Please find our comments on the proposed regulation in the letter uploaded with this submission. We thank you and the CARB Board for all your work in developing the Low Carbon Fuel Standard.

Sincerely,

John Sens  
EcoEngineers

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/286-lcfs18-WylUN1YwBCJVPwR1.pdf>

Original File Name: Regulatory Changes Letter\_2018.08.30.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:24:56

No Duplicates.

**Comment 23 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Patrick

Last Name: Foody

Email Address: pat.foody@iogen.ca

Affiliation: Iogen Corporation

Subject: Comments on LCFS Proposed Amendments

Comment:

Please see attached for Iogen Corporation's comments on the proposed amendments to the LCFS.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/287-lcfs18-AGIROFw6UWdROQhX.pdf>

Original File Name: Iogen Comments on LCFS Proposed Amendments.pdf

Date and Time Comment Was Submitted: 2018-08-30 12:54:08

No Duplicates.

## **Comment 24 for LCFS 2018 (lcfs18) - 15-2.**

First Name: kevin

Last Name: maggay

Email Address: kmaggay@semprautilities.com

Affiliation: SoCalGas

Subject: SoCalGas LCFS Comment Letter

Comment:

Attached is SoCalGas' comment letter on the Low Carbon Fuel Standard 2018 Amendments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/288-lcfs18-BnUBZF07VFgEbgNg.pdf>

Original File Name: SCG LCFS Comments 8-30-18 FINAL.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:31:31

No Duplicates.

**Comment 25 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Tim

Last Name: Dewey-Mattia

Email Address: tim@naparecycling.com

Affiliation: Napa Recycling & Waste Services

Subject: LCFS Program Changes

Comment:

Please see the attached letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/289-lcfs18-UT1dOFE2VnZVDAdk.pdf>

Original File Name: LCFS Comment Letter - Napa Recycling - 8.30.18.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:22:46

No Duplicates.

**Comment 26 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Jeremy

Last Name: Martin

Email Address: [jmartin@ucsusa.org](mailto:jmartin@ucsusa.org)

Affiliation: Union of Concerned Scientists

Subject: LCFS 2018 Amendments, August 13 15 day changes

Comment:

See attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/290-lcfs18-AXQFYFUnAg4AZQlm.pdf>

Original File Name: UCS comments on 15 day changes August 30.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:35:43

No Duplicates.

**Comment 27 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Jacqueline

Last Name: moore

Email Address: jacqueline.moore@polb.com

Affiliation:

Subject: Port of long Beach Comment Letter on Second Proposed Amendments to the LCFS Regulation

Comment:

The Port of Long Beach is pleased to submit a second letter on the LCFS Amendments, attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/291-lcfs18-BzUBN1dnVD9RZwgw.pdf>

Original File Name: 20180830\_POLB\_CARB\_Comment\_Ltr\_LCFS\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:39:07

No Duplicates.

## **Comment 28 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Thomas  
Last Name: Lawson  
Email Address: thomas@cngvc.org  
Affiliation: CNGVC

Subject: CNGVC Comments on LCFS Proposed Changes

Comment:

Attached are our comments.

Thank you.

Thomas Lawson  
President  
California Natural Gas Vehicle Coalition

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/292-lcfs18-AGMFbVE3WH1XMLIN.pdf>

Original File Name: CNGVC Comments on the Proposed Changes to the LCFS Program  
8.28.18.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:52:11

No Duplicates.

**Comment 29 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation:

Subject: WSPA LCFS Comment letter

Comment:

Please see attached WSPA comment letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/293-lcfs18-WyxTJIIjAjACW1U2.pdf>

Original File Name: WSPA Comment Letter\_ LCFS 2nd 15\_day  
Package\_08\_30\_2018\_final.pdf

Date and Time Comment Was Submitted: 2018-08-30 13:53:45

No Duplicates.

## **Comment 30 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Leticia

Last Name: Phillips

Email Address: leticia@unica.com.br

Affiliation: UNICA - Brazilian Sugarcane Industry Ass

Subject: UNICA Comments to CARB

Comment:

Please see attached UNICA's comments to CARB.

Thank you,

Leticia Phillips

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/294-lcfs18-VWdVYwAwWDMANIRs.pdf>

Original File Name: 20180830 UNICA Comments to CARB.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:00:15

No Duplicates.

## **Comment 31 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Chris

Last Name: Bliley

Email Address: [cbliley@growthenergy.org](mailto:cbliley@growthenergy.org)

Affiliation: VP of Regulatory Affairs for Growth Ener

Subject: Growth Energy's Response

Comment:

Please see attached Response submitted on behalf of Growth Energy's Response with Exhibits A and B.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/295-lcfs18-ViVXNFMxUGxWPlcz.pdf>

Original File Name: Second 15-Day Comments w-Exhibits A B (00912104).pdf

Date and Time Comment Was Submitted: 2018-08-30 13:54:30

No Duplicates.

## **Comment 32 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Amanda  
Last Name: Myers  
Email Address: amanda.myers@chargepoint.com  
Affiliation: ChargePoint

Subject: ChargePoint Comments on LCFS Second 15-Day Language  
Comment:

Thank you very much for the opportunity to comment on the Low Carbon Fuel Standard Second Notice of Public Availability of Modified Text and Availability of Additional Documents and Information.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/296-lcfs18-WjlSPABgVncFZFI3.pdf>

Original File Name: ChargePoint LCFS comments\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:01:51

No Duplicates.

## **Comment 33 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA LCFS CCS Comment letter

Comment:

Please see attached WSPA LCFS CCS Comment letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/297-lcfs18-AHdUIVQIV2UEXVU2.pdf>

Original File Name: WSPA Comment Letter\_ LCFS 2nd 15\_day Package\_CCS\_.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:10:45

No Duplicates.

## **Comment 34 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Catherine  
Last Name: Reheis Boyd  
Email Address: joey@wspa.org  
Affiliation: WSPA

Subject: WSPA LCFS CCS Comment letter

Comment:

Please disregard last post, this one has a signature. Thanks.  
Please see attached WSPA LCFS CCS Comment letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/298-lcfs18-Wi1XIIIjWGpQCQNg.pdf>

Original File Name: WSPA Comment Letter\_ LCFS 2nd 15\_day Package\_CCS final.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:15:51

No Duplicates.

**Comment 35 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Thomas  
Last Name: Solomon  
Email Address: [tsolomon@winston.com](mailto:tsolomon@winston.com)  
Affiliation: Winston & Strawn, LLP

Subject: BART Comments on Second 15-Day Changes to LCFS

Comment:

Dear Clerk of the Board,

Attached, please find comments of the San Francisco Bay Area Rapid Transit District (BART) on CARB Staff's Second 15-Day Changes to the LCFS Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/299-lcfs18-VzUHYABzACdRCFMw.pdf>

Original File Name: BART Comments on Second 15-Day LCFS Rulemaking Package [FINAL 2018.08.30].pdf

Date and Time Comment Was Submitted: 2018-08-30 14:14:27

No Duplicates.

**Comment 36 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Mark

Last Name: Rigby

Email Address: Mark.Rigby@dteenergy.com

Affiliation:

Subject: DTEER Comments on CCS Protocol

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/300-lcfs18-VDAAcgRgUGYHclMM.pdf>

Original File Name: DTEES - CARB LCFC CCS Comments (08 30 18).pdf

Date and Time Comment Was Submitted: 2018-08-30 14:28:17

No Duplicates.

## **Comment 37 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Julia

Last Name: Levin

Email Address: [jlevin@bioenergyca.org](mailto:jlevin@bioenergyca.org)

Affiliation: Bioenergy Association of California

Subject: Importance of LCFS Fuel Neutrality / Carbon Focus

Comment:

Please find comments from many of California's biofuels producers and associations urging the Board to maintain a fuel neutral program based on lifecycle carbon intensity, rather than adopting preferential, non-science based preferences for certain technologies.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/301-lcfs18-WzkAbwBuAzYEdwBl.pdf>

Original File Name: Biofuels Coalition letter on LCFS.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:48:16

No Duplicates.

## **Comment 38 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Don

Last Name: Yochum

Email Address: don.yochum@trane.com

Affiliation:

Subject: COD Substitution for Diluted Manure Flows

Comment:

Sir: I am enclosing a comment for your consideration that utilizes COD as a substitution methane metric for L1.1.3 in the LOP for dairy manure.

There are numerous dairies that utilize diluted wash down effluent, which is then screened for solids prior to discharge to the lagoon. The solids are utilized for nutrition management.

However, there is a sizeable decrease in VS in the effluent due to the screening, which underreports the CH4 emissions in the baseline.

We are proposing COD, a known substitute currently used by IPCC to determine emissions. It is insensitive to screening procedures and would provide an accurate assessment of the baseline and project performance in BCS systems that process diluted effluent.

I have attached a detailed briefing for your review.

Best Regards,  
Don Yochum  
Trane Energy Services

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/302-lcfs18-AndWJFM7BDsDbAd9.pdf>

Original File Name: Utilization of COD for L1v3.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:46:52

No Duplicates.

## **Comment 39 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Greg

Last Name: Kester

Email Address: [gkester@casaweb.org](mailto:gkester@casaweb.org)

Affiliation:

Subject: Comments on Proposed Changes to LCFS Program

Comment:

Please find attached comments on changes to the LCFS program from the California Association of Sanitation Agencies.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/303-lcfs18-VW1cd1JgUzAKIQIz.pdf>

Original File Name: 8-30-18 CASA Comments on LCFS Proposed Changes.pdf

Date and Time Comment Was Submitted: 2018-08-30 14:55:04

No Duplicates.

**Comment 40 for LCFS 2018 (lcfs18) - 15-2.**

First Name: George

Last Name: Peridas

Email Address: Non-web submitted comment

Affiliation: CATF and NRDC

Subject: LCFS 2nd 15-day Modification comments by CATF & NRDC

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/304-lcfs18-AGNRNFwuVXYCdlM8.pdf>

Original File Name: CCSProtocol\_2nd 15Day comments\_Aug30\_2018\_CATF\_NRDC.PDF

Date and Time Comment Was Submitted: 2018-08-30 15:07:52

No Duplicates.

**Comment 41 for LCFS 2018 (lcfs18) - 15-2.**

First Name: George

Last Name: Peridas

Email Address: Non-web submitted comment

Affiliation: C2ES & CATF & EDF & NRDC

Subject: LCFS 2nd 15-day Modification comments by C2ES, CATF, EDF & NRDC

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/305-lcfs18-AGNVMFclWXoGclc4.pdf>

Original File Name: CCSProtocol\_2nd 15Day comments\_Post-Injection Monitoring\_Aug30\_2018\_C2ES\_CATF\_EDF\_NRDC.PDF

Date and Time Comment Was Submitted: 2018-08-30 15:09:25

No Duplicates.

**Comment 42 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Bang

Last Name: Phung

Email Address: bang.phung@ladwp.com

Affiliation: Los Angeles DWP

Subject: LADWP Comments on LCFS Second 15-Day Modification

Comment:

See attached for Los Angeles Department of Water and Power comments on the LCFS Second 15-Day Modification.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/306-lcfs18-Vm4FLlFiA2QBKgQ1.pdf>

Original File Name: 8-24-18 LADWP Comment Letter on LCFS Second 15-Day Change.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:11:03

No Duplicates.

**Comment 43 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Dorothee Luisa

Last Name: Polzer

Email Address: Non-web submitted comment

Affiliation: Copersucar

Subject: Comments on LCFS 2nd 15-Day Modifications

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/307-lcfs18-VDdSO1U5WGZQM1M9.pdf>

Original File Name: Comments on proposed amendments on LCFS.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:16:29

No Duplicates.

**Comment 44 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Ryan

Last Name: Schuchard

Email Address: rschuchard@calstart.org

Affiliation: CALSTART

Subject: Comments on LCFS 15-day modifications

Comment:

Comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/308-lcfs18-WzhQN1c6WXkCcFQ1.pdf>

Original File Name: CALSTART comments on LCFS - August 20, 2018.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:19:58

No Duplicates.

## **Comment 45 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Steven

Last Name: Eisenberg

Email Address: steven.eisenberg@srectrade.com

Affiliation:

Subject: LCFS18 Comments

Comment:

Please find attached SRECTrade's comments for the current submission period. Thank you for your consideration.

Best,  
Steven Eisenberg  
SRECTrade, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/309-lcfs18-UiEBdQZiAjJQIIIg.pdf>

Original File Name: SRECTrade Comments to CARB LCFS 2018 Regs\_August 30 2018\_FINAL.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:24:14

No Duplicates.

**Comment 46 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Rock  
Last Name: Zierman  
Email Address: Rock@cipa.org  
Affiliation: CIPA

Subject: CIPA LCFS Comments  
Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/310-lcfs18-UTJXOFAhADIHXINh.pdf>

Original File Name: CIPA 2nd-15 Day Comments LCFS.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:36:45

No Duplicates.

## Comment 47 for LCFS 2018 (lcfs18) - 15-2.

First Name: harvey

Last Name: eder

Email Address: harveyederpspc@yahoo.com

Affiliation: pspc public solar power coalition

Subject: ITSC Immediate Total Solar Conversion of Ca et al by HE/PSPCfor 2030 Ca Scoping Plan Paper

Comment:

lcfs 18 comments of harvey eder founder director of pspc public solar power coalition fded 1978

i,we hereby incorporate by reference all history of my /our communications with us and the scd bad carb both oral and written etc

and last and this years litigation with scd and carb on the 2016 scd plan which carb and the dist approved. this includes the entire record of he pspc for all past planas includding decades of backsliding 86 ing solar air pollotion for over 40 years of dist plans wh with us .

this includes the bc cases filed in june and july 1992 and asw welll our january 1981 case filed aqgainswt the cpucs final decsion in oii 42 which zwas for --- ive been ourged and cut off several times while weitting this so 8imndont want to get cut oof or nnot include theswe comments so ill submitt this and send another asap etc

harvey eder pspc 310 3832589 1223 wilshire blvd. 667 santqa moniua ca 90403 also the sate health and saFETY CODE 53002 B MAKES THE 90 PERCENT GAS USED IMPORTED INTO CA IS ILLEGAQL SINCE 1981 AND WAS PURGED IE NOY EVER PRINTED IN THE4 BLUE BOOK CALIFORNIAS AIR POLLUTION CONTROLK LAWS

YOUR N GASW LCFS AND OTHER C ANDS I ANDS RWES IN CQA IS ALL ILLEGAL

ANS SO CALL3ED RENEWABLE N DEIRTY TI TOXIC GAS SPREAQDS DRUG RESISTANT ANTI BIOTICSW VIA THE CA GAS PIPELINE DIST SYSTE3M 10 ANSD 100S OT THOUSANSDAW DIE E3SWCH YR FROM THIS ANDE YOU FOLDS SSUBSADIZE THIS....

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-08-30 15:18:13

No Duplicates.

**Comment 48 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Tim

Last Name: Lovley

Email Address: [tlovley@macphersonenergy.com](mailto:tlovley@macphersonenergy.com)

Affiliation: Macpherson Energy Corporation

Subject: LCFS 18 Appendix B CCS Commets

Comment:

Comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/312-lcfs18-Uj9UN1EzV1tRNgZ2.pdf>

Original File Name: MEC Appendix B CCS Comment Letter 08.30.2018.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:42:42

No Duplicates.

**Comment 49 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Fariya

Last Name: Ali

Email Address: fariya.ali@pge.com

Affiliation: PG&E

Subject: PG&E Comments on Second Round of 15-Day Changes to Draft LCFS Amendments

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/313-lcfs18-BXUHZIQwBwsDaQZl.pdf>

Original File Name: PGE LCFS 15-2 Comments\_8-30-18.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:43:31

No Duplicates.

**Comment 50 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Eileen

Last Name: Tutt

Email Address: eileen@caletc.com

Affiliation: CalETC

Subject: LCFS18 Item 18-3-3 Comments 15-day modifications, second round

Comment:

Please see attached support comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/314-lcfs18-BmUGYV0wV2EDcQhr.pdf>

Original File Name: CalETC Comment Letter LCFS 15-day round 2 changes Final.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:44:53

No Duplicates.

## **Comment 51 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Paul

Last Name: Hernandez

Email Address: paul@envoythere.com

Affiliation: Envoy Technologies Inc. (Envoy)

Subject: Envoy Technologies Inc. : response to LCFS Workshop and Proposed Regulation Amendments

Comment:

Envoy Technologies Inc. (Envoy) is pleased to provide these comments in response to the Staff's Suggested Modifications to the 2018 Amendments Proposal Low Carbon Fuel Standard Regulation Workshop, held August 8, 2018, and the Proposed Amendments to the Low Carbon Fuel Standard, released August 13, 2018. Please feel free to reach out to Envoy to seek clarifications or with any questions you have regarding these comments.

Thank you,

-Paul D. Hernandez  
paul@envoythere.com

Attachment:

Original File Name: Comments of Envoy Technologies before CARB, LCFS, FINAL PDF 8.30.2018.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:48:39

No Duplicates.

## **Comment 52 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Janelle

Last Name: London

Email Address: [janelle@coltura.org](mailto:janelle@coltura.org)

Affiliation:

Subject: Comments on LCFS from Coltura

Comment:

Please see the attached letter.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/316-lcfs18-WmsHOQY3UzgGMwU1.docx>

Original File Name: 180830 20180828 LCFS Sign On Letter.docx

Date and Time Comment Was Submitted: 2018-08-30 15:50:23

No Duplicates.

**Comment 53 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Michael

Last Name: Backstrom

Email Address: Michael.Backstrom@sce.com

Affiliation: SCE

Subject: SCE comments on second round of LCFS 15-day modifications

Comment:

see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/317-lcfs18-UiFVMFUxU19SNwJt.pdf>

Original File Name: SCE comments on LCFS 2nd round 15-day modifications.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:30:42

No Duplicates.

**Comment 54 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Jamie  
Last Name: Knapp  
Email Address: [jamie@jknappcommunications.com](mailto:jamie@jknappcommunications.com)  
Affiliation: J Knapp Communications

Subject: Fuel provider and NGO joint comments

Comment:

Attached is a joint comment letter from fuel providers, environmental and public health organizations re: proposed hydrogen infrastructure capacity credit provision in second 15-day package.  
Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/318-lcfs18-VmcFO1dmUzhQZVBg.pdf>

Original File Name: 180830\_Second15DayCommentHydrogenStationCredits.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:00:48

No Duplicates.

## **Comment 55 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Paul

Last Name: Hernandez

Email Address: paul@envoythere.com

Affiliation: Envoy Technologies Inc. (Envoy)

Subject: Response to LCFS Workshop and Proposed Regulation Amendments

Comment:

Envoy Technologies Inc. (Envoy) is pleased to provide these comments in response to the Staff's Suggested Modifications to the 2018 Amendments Proposal Low Carbon Fuel Standard Regulation Workshop, held August 8, 2018, and the Proposed Amendments to the Low Carbon Fuel Standard, released August 13, 2018.

Please feel free to reach out to Envoy to seek clarifications or with any questions you have regarding these comments.

Thank you,

-Paul D. Hernandez  
paul@envoythere.com

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/319-lcfs18-VTZdNFQ4BTtQM1M9.pdf>

Original File Name: Comments of Envoy Technologies before CARB, LCFS, FINAL PDF 8.30.2018.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:08:20

No Duplicates.

## **Comment 56 for LCFS 2018 (lcfs18) - 15-2.**

First Name: John  
Last Name: Thornton  
Email Address: john@CleanFuture.us  
Affiliation: CleanFuture, Inc.

Subject: LCFS 18 - Comments on Proposed Second 15-Day Modification  
Comment:

Dear Clerk of the Board,

Attached please find comments to the Second Modified Text in the proposed Low Carbon Fuel Standard regulations.

Please contact me if there are any questions or issues relating to the comment. Thank you for your assistance.

Best Regards,

John

John A. Thornton  
President

CleanFuture, Inc.  
(503) 806-1760 (mobile)  
(503) 427-1968 (direct)  
P.O. Box 23813  
Portland, Oregon 97281-3813 USA  
john@CleanFuture.us

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/320-lcfs18-WjkBa105UmAEbARi.pdf>

Original File Name: CleanFuture comments for second 15-day LCFS 180830.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:09:27

No Duplicates.

**Comment 57 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Andrew

Last Name: Krulewitz

Email Address: andrew.krulewitz@flux-ev.com

Affiliation: Flux

Subject: LCFS Credits for Multi-Family Fuel Supply Equipment

Comment:

Please find comments from Flux attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/321-lcfs18-VDJcNgB0U3gDWgB1.pdf>

Original File Name: Flux EV LCFS Aug. 30 Comments.pdf

Date and Time Comment Was Submitted: 2018-08-30 15:41:57

No Duplicates.

**Comment 58 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Tim

Last Name: Dewey-Mattia

Email Address: tim@naparecycling.com

Affiliation: Napa Recycling & Waste Services

Subject: LCFS Program Changes

Comment:

Please see attached corrected comment letter. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/322-lcfs18-UT0CZ106WHgCWwVm.pdf>

Original File Name: LCFS Comment Letter - Napa Recycling - 8.30.18.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:29:41

No Duplicates.

## **Comment 59 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Steve

Last Name: Lins

Email Address: Steve.Lins@smud.org

Affiliation:

Subject: SMUD Comments on Proposed Second 15-day Modifications to the Pending Amendments to LCFS

Comment:

Please see attached Comments by the Sacramento Municipal Utility District on Proposed Second 15-Day Modifications to the Pending Amendments to the Low Carbon Fuel Standard Regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/323-lcfs18-Uj4HZFA2UC4LPAQ8.pdf>

Original File Name: LEG-18-0408-CARB-SMUD-Comments-2nd-15-day-Mods-LCFS.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:34:44

No Duplicates.

**Comment 60 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Colin

Last Name: Murphy

Email Address: colin.murphy@nextgenpolicy.org

Affiliation: NextGen California

Subject: NextGen Comment on 2nd LCFS Modified Text

Comment:

Please find attached NextGen California's comment on the 2nd LCFS Modified text, along with a capacity credit cost worksheet.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/324-lcfs18-UD4BYIYvUnVRMAht.zip>

Original File Name: NextGen August 30 Comment.zip

Date and Time Comment Was Submitted: 2018-08-30 16:35:01

No Duplicates.

**Comment 61 for LCFS 2018 (lcfs18) - 15-2.**

First Name: DOUGLAS

Last Name: BUTTON

Email Address: dougb@ssfscavenger.com

Affiliation: South San Francisco Scavenger Co. Inc.

Subject: Comments To Amendments to the Low Carbon Fuels Standard

Comment:

Please see attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/325-lcfs18-Uz4FewcrUTZVY1Jl.pdf>

Original File Name: MX-4070N\_20180830\_164252.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:40:27

No Duplicates.

## Comment 62 for LCFS 2018 (lcfs18) - 15-2.

First Name: harvey

Last Name: eder

Email Address: harveyederpspc@yahoo.com

Affiliation: pspc public solar power coalition

Subject: part 2 lcfs comments 18 first at 3 18 pm today and 86ed now part 2 H eder pspc

Comment:

4 01pm 8 39 18 comments part 2 of i dont know by harvey eder ex dir founder of pspc etc

ch4 has increased over 30 per cent ocer the past 12 years as cited in the scd 2-16 plan in chapter 10 page 2 and 3 written by arron katzenstein who was taken w away from working with me us 2 years ago and is now incharge of the dist labs also dr, kaqTZENSTEIN DID HIS DR DISSERTATION ON METHANE CH4 . . THATS WHER NOBELS IN CHEMISTRY WHENT TO CHEMISTS REVEALING THE HOLE IN THE OZONE LAYER ANSD ITS MAN HUMAN MADE STOFFSTUFF

ALSO SEE MY OUR COYRIGHTEDE RESPOONCE TO THIS AFTER MUCH DISCUSWSION WITH DR, K INC BY REF MY OUR AUGUST 12,2016 COMMENTS ON THIS ANSD THE PLAN ANXDD THEIR IE THE DIST ANDE CARB COMPLETEO OMISSION OF AND TECHNICAL RESPONCE TO THIS NE3W FACT ETC AND OTHER VARIABLES ETC'

CARB NOW USES ABOUT 459 PPMCO2E OR EQIUVILENT ANDS REAL NUMBERS ARRRRE FROM 80 PERCENT TO 100 PERCENT HIGHER NOWW NOW 205 0 OR 2100 ETC

PLEASE G3ET ME INSIDE THE GOVS G;OB;A CLIMATE CONFERENCE . . ANDS INC BY REF IS ARE ALL OF MY WI WRITTEN AND ORAL COMMUNICAQT5IONS AND AOR CONTACT 9INCLUDING CPUC VBIOLATING MY OUR RIGHTS ETC AS AN THE FIRST ENVIRONMENTAL JUSTICER FOLK BEFOR THE TER4M WAS EVER USED AND CALLED AN FBI AQGENT BY TOM HAYDEN GOV BROWWNS POINT MAN 78 TO 82 HEAD OF AOLr cal solar cal whentelling organizers ffffffff of the first national anti nuc power pro solar renewables to the easters organizers of d.c. that he didn't come tto the meeting because i harvey eder was an fbi agent this is deep shit process gov b get me into your global climate conf sir if you are rrrrightous to any extent5 process ej etc justice all the record is in the record and incorporate this and all other comments ever tto the state of ca other states fe3deral entities an internationallllllMWERIGAN SOLAR ENRERGY SOCIETY INT SOLAER ENERGY SOCIETY ETYC THE I 1SWT NATIONAL ANTI NUC POWEER PRO SOLAR RENEWS WAS HEALD IN AUGUST 1978 1 WEEK AFTER THE CALIF ABLONE QABALONE ALLLIANCDEHAD 500 FOLKS ARRESTED AT DIABLOCANYON NUCLEAR CCPOEPOWER PLANT IN SLO...I WAA THE CONSESSUS CHOSN REP MONTHS BEFORE ME MTING AT THE uNIOVERSITY OF kentucky Louisville..both hayd--- also the book we publisjhed of the meeting purged califonia ansd much of the west including the west coast... greateatful de3ad their aint no time to hate/ b either anit or barely teens etc and brownsw .....bad aqctiond 40 yrsw ago wed be4 way on the way to or at local state nat ansd int nat solar conversion v.

almost up the cr4eek without a paddle...this new left bws has been extremely costly--- also the book we publisjhed of the meeting purged california ansd much of the west including the west coast...  
greaatful de3ad their aint no time to hate/ b either anit or barely time to waittt.....neal young the real...this stuff is cited in the current litigation transcript.... ALSO AUTHOR OF THE APX 50 ITEM SOLAR NEW3 DEAL SUBMIITTED IN 2016 AND 2017 ETC...  
ALSO IOINCORPORATE BY REFERENCE 10 PULS YEARS AGO COMMUNICATIONS WEITH JOHN CPOURTES AND ANEEL IS ALL IN THE RECORD , , ITHIIWSTHIS INCLUDES THE LACK OF REAL WORLD EMISSIONS FROMALL WAYS OF THE ENGINE AND THE TRANSPORT SYSTEMS.. WHICH WAS IS HAS NEVEER BEEN STUDIE4S , ALSO HAD VOCONVERDSATRIONS WITH dRR. LINDA SMITH WHOO AGRE4ES THAT A STUDYT NE3EDS TI B E DI DONE ON PRE MATURE DEATHS PEER MILLION FROM CH4 METHANE ( NOW 86 GWP IS USED BY IPCC CALIF TOO HUH  
G USING WASTE FROM SEWERSS LANDFILLLD ANED FEED LOTS OVER 7-

7 PERCENT OF HUME3N ANTI BIOTICS GO TO CATTRLE G FEED IT WAS NOT REQUIRED TO REPORT DE3ATHS FROM DRUG RESISTANT AQNTI BIOTICS UNTIL THE DFIRST OF THIS YER..  
SORRY ABOUT MY TYPING I HAD EMERG4EMCY SUR4GERY ON MY HANDESW YRWS AAGO COLOR OF AUTHORITY ETC

THIS IS PART 2 OF AR 4 21 PM 8 30 M18 HARVEY EDER SELF ANSD FOR PSPC ANS THIS AND IHNC BY REF ALL OF THE GOVS GLOBAL CLIMATE CONFERENCE WOONT LET ME US IN CAUSE I WWE ARE THE PROGRESSIVES

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2018-08-30 15:59:41

No Duplicates.

## **Comment 63 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Neal

Last Name: Reardon

Email Address: [nreardon@sonomacleanpower.org](mailto:nreardon@sonomacleanpower.org)

Affiliation:

Subject: The Smart EV Charging Coalition Comments on the 8/13 and 8/15 LCFS Proposed Amendments

Comment:

Dear Clerk of the Board,

Please find attached the Smart EV Charging Group Comments on the August 13 and 15, 2018 Proposed Amendments to the Low-Carbon Fuel Standard Regulation. Thank you.

Sincerely,

Neal Reardon  
Director, Regulatory Affairs  
Sonoma Clean Power Authority  
On behalf of the Smart EV Charging Coalition

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/327-lcfs18-V2ZRb1NiVT4GM1Bg.pdf>

Original File Name: 180830\_Smart EV Charging Group LCFS 15 day comments (00455182xBA8E1).pdf

Date and Time Comment Was Submitted: 2018-08-30 16:44:50

No Duplicates.

**Comment 64 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Sara

Last Name: Kamins

Email Address: smk@cpuc.ca.gov

Affiliation:

Subject: CPUC comments

Comment:

Please find attached the California Public Utilities Commission (CPUC) comments on CARB's proposed second 15-day modifications to the LCFS regulation.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/328-lcfs18-UGBSbAAvB2cBNwQq.pdf>

Original File Name: 08.30.18 - Sam Wade re CARB.pdf

Date and Time Comment Was Submitted: 2018-08-30 16:53:05

No Duplicates.

**Comment 65 for LCFS 2018 (lcfs18) - 15-2.**

First Name: scott

Last Name: Hedderich

Email Address: scott.hedderich@regi.com

Affiliation:

Subject: 15 day Comment period LCFS amendments

Comment:

please see our enclosure

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/329-lcfs18-AnBQM107VFhVPwVm.docm>

Original File Name: REG LCFS Comments for 15 Day Comment Period ending 8.30.18 final.docm

Date and Time Comment Was Submitted: 2018-08-30 16:59:51

No Duplicates.

## **Comment 66 for LCFS 2018 (lcfs18) - 15-2.**

First Name: Thomas

Last Name: Jelenic

Email Address: Non-web submitted comment

Affiliation:

Subject: Comment on Second 15-Day Notice - LCFS

Comment:

Please find attached PMSA's comments on the Second 15-day Notice to the Low Carbon Fuel Standard Regulation Amendments.

Sincerely,  
Thomas Jelenic

\*\*Uploaded again due to being submitted to wrong section. This comment is NOT late.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/339-lcfs18-BnZVIFE9BDYGLgl5.pdf>

Original File Name: psma.pdf

Date and Time Comment Was Submitted: 2018-11-01 11:35:01

No Duplicates.