

**From:** jennifernpont@gmail.com on behalf of jennifer pont <pont@lifecycleassociates.com>  
**Sent:** Thursday, June 18, 2015 3:41 PM  
**To:** d'Esterhazy, Stephen@ARB  
**Cc:** Susan Boland; Stefan Unnasch  
**Subject:** Question about proposed provisional pathway language

Hi Stephen -

Thanks for talking today. The proposed regulation order in 95488 (d)(2)Provisional Pathways states that credits generated by fuel producers with provisional pathway CI values may not be traded, sold, used for compliance for a period of 2 years or until 2 years of operational data are provided to validate the CI number. At this point the CI value is either adjusted up or left where it is and it seems the provisional credits become actual credits.

Our question is whether this provision applies to all fuel producers with provisional CI values or just newly provisional (going forward). Do these credit limitations apply to fuel producers that already have provisional pathway CI values?

Thanks!  
Jenny

--

**Jennifer Pont** | Senior Engineer | **Life Cycle Associates, LLC**

884 Portola Road Suite A11

Portola Valley, CA 94028

**O:** +1.650.740.0410 | **F:** +1.484.313. 9504 | **E:** [pont@lifecycleassociates.com](mailto:pont@lifecycleassociates.com)

[www.LifeCycleAssociates.com](http://www.LifeCycleAssociates.com) | [Follow us on LinkedIn](#)