



September 3, 2021

Rajinder Sahota
Deputy Executive Officer
Climate Change & Research
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2022 Scoping Plan Update Scenario Concepts Technical Workshop

Dear Ms. Sahota:

Thank you for the opportunity to engage and participate in the development of the 2022 Scoping Plan. In response to the August 17th workshop on modeling scenarios, World Energy wishes to provide the following brief comments.

The workshop posed the question about how to best utilize existing refinery assets and scale down oil refining in the state. World Energy is the first company to retrofit a California petroleum refining facility into a world-class, all-renewable fuel production plant. Our Paramount facility produces renewable diesel, sustainable aviation fuel, and renewable naphtha that is displacing fossil fuel today. We have achieved this production in accordance with California's strict environmental permitting and while paying a living wage to our local workforce. This achievement is due in part to the Low Carbon Fuel Standard and a success of the California Air Resources Board (CARB) programs.

World Energy's suggestion for the modeling scenarios would be to retain maximum flexibility regarding the potential for refinery assets to be re-purposed. Similar flexibility should be included in the future potential for increasingly diverse biomass resources to be utilized as a biofuel feedstock. Taken together, this flexible vision will provide more compliance options for CARB's modeling scenarios, stabilize economic activity and jobs, and send an important signal to investors. Channeling both the biomass feedstock and refinery assets into renewable fuel production will allow CARB to accelerate its carbon neutrality targets and aim for the 2035 net neutrality goal.

PARAMOUNT FACILITY

AltAir Paramount, LLC

14700 Downey Avenue, Paramount, CA 90723

P. 562.748.4726 (Main) | E. info@worldenergy.net | W. worldenergy.net



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CARB is considering a wide range of issues as part of the 2022 Scoping Plan Update. The Scoping Plan will set the course that California must take to meet these key climate goals. Given the importance of moving as expeditiously as possible, we encourage and support CARB's effort to remain on schedule to adopt an updated plan by the conclusion of 2022 as presented at the initial Scoping Plan kickoff workshop in June.

We believe that California can and should lead the world in demonstrating how the energy transition can deliver jobs in traditional sectors, support progress on environmental and economic equity challenges, and deliver decarbonization. We are committed to doing all we can to support CARB's work to that end.

Sincerely,

A handwritten signature in blue ink that reads "Leeor Alpern".

Leeor Alpern
Director of Government and Community Relations

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