

# DF-AP #1, LLC

September 9, 2021

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: DF-AP #1, LLC Tier 2 Pathway Application No. B0173 for Low-CI Electricity Gas from Dairy Manure from the Big Sky Dairy Digester

DF-AP#1, LLC (DFAP) submits this letter in response to public comments regarding the above referenced Tier 2 pathway application submitted by the Central California Asthma Collaborative (“Commentors”). In accordance with the Low Carbon Fuel Standard, Section 95488.7(d)(5)(A): “Only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant.” Accordingly, DFAP as the fuel pathway applicant, offers the following responses to the parts of the public comments which describe potential factual and methodological errors, specifically Section III of the comment letter. Commentor arguments are listed in *italics* followed by DFAP’s responses.

*CPUC and the CA state legislators have yet to settle the issue of whether this source of transportation fuel is eligible for LCFS program entry*

Pursuant to section 95488.8(i)(1) of the California Air Resource Board’s Low Carbon Fuel Standard Regulation, electricity produced from renewable or low-carbon intensity sources, providing it is directly supplied to the electricity generation unit, may be matched to electricity that is either used as a transportation fuel or used in electrolysis to produce hydrogen for transportation purposes using book-and-claim accounting. Pursuant to the fuel pathway classification system described in section 95488.1 of the LCFS Regulation, DFAP has fully complied with the requirements of the LCFS program in submitting a Tier 2 fuel pathway application to determine the carbon intensity of the site-specific resource and generation equipment.

DFAP believes that no revisions to its pending application are needed and respectfully requests ARB to finalize its approval of the pathway.

Sincerely,



Dylan Seff  
President and CEO  
DF-AP #1, LLC