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Comment 53 for Public Comments for LCFS pathway applications  
(tier2lcfspathways-ws) - 2nd Workshop.**

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Subject: Temp FPC for Dairy Biogas to Hydrogen

Comment:

ARB's staff document refers to hydrogen from SMR from LNG. This would indeed be a worst case; however, LH2 plants receive natural gas by pipeline. The change in CI would correspond to

Base hydrogen - NG\_CI + RNG CI

The CI of NG direct use and upstream is 71 g/MJ

In ARBs example, the CI would be  $185 - 71 - 150 = -36$  g/MJ

For typical LH2 pathways,  $155 - 71 - 150 = -66$  g/MJ

The average of these two values is -51 g/MJ, which is consistent with the proposed temporary FPC.

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Date and Time Comment Was Submitted: 2020-11-12 08:11:19

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