

**From:** Stefan Unnasch <[unnasch@lifecycleassociates.com](mailto:unnasch@lifecycleassociates.com)>  
**Sent:** Monday, March 1, 2021 10:58 AM  
**To:** Prabhu, Anil@ARB <[Anil.Prabhu@arb.ca.gov](mailto:Anil.Prabhu@arb.ca.gov)>  
**Subject:** Tier2 Application Comment, Application B0111

Dear Anil,

The pathway document does not explain how renewable power production in Arizona complies with LCFS §95488.8.i(1)A

"The low-CI electricity must be supplied to the grid within a California Balancing Authority (or local balancing authority for hydrogen produced outside of California).

The implication of this section is that hydrogen produced outside of California can be shipped to California but that low CI electricity must be supplied within a California Balancing Authority. The project is outside of the California region as indicated in b0111\_greet cell D24, AZNM Mix.

Does this provision of the LCFS regulation mean that renewable power anywhere in the grid connected to the U.S. can "be supplied" or is the relatively close proximity to California a determining factor?

Also, the pathway document does not identify how ARB guidance 19-06 has been implemented in regard to applying CARB staff's suggestion that 50% is a reasonable efficiency benchmark based on the average efficiency of NG-derived electricity at California power plants and best available technologies.

Thanks for taking these comments into consideration.

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