



June 20<sup>th</sup>, 2023

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Comment from Mr. Mike Keller

Renewable Energy Group, Inc., (REG) which is a wholly owned subsidiary of Chevron Corporation, thanks Mr. Keller for his comment. The comment on Application No. B0421 states "I find it highly objectionable to use fossil fuel to aggregate feedstock from California and elsewhere, ship it halfway across the country to be made into "renewable" diesel, shipped back to California to receive LCFS credits? The actual carbon footprint for this must be enormous. This undermines the spirit of LCFS credits and allows refineries in California to thumb their noses at CARB and carbon emissions."

For background, the REG Geismar facility generates renewable fuel products including renewable diesel, renewable propane, and renewable naphtha. These fuels can be used in place of petroleum fuels to displace fossil based fuels and have a lower carbon intensity than fossil fuels.

REG staff worked closely with its verification body and CARB staff to ensure that the information submitted for the REG Geismar LCFS pathway application met all program requirements. The requirements include detailed feedstock transportation distance information from the feedstock suppliers to the REG Geismar fuel production facility.

The LCFS program uses the CA-GREET 3.0 lifecycle analysis calculator to determine carbon intensity scores for fuels that participate in the program. Transportation modes include truck, barge, rail, and ocean tanker with a respective emission factor for each transportation mode. REG's application included all methods of transportation as they are the well-established means of bulk transportation for feedstock commodities and are allowed under the LCFS program.

From a simple logistics point of view, REG looks to reduce the transportation distance for its feedstock to lower the carbon intensity scores for our fuel pathways and seeks the most efficient and cost-effective means available as part of our normal business practices. REG has entered into many long-term feedstock supply agreements so that we have feedstocks readily and conveniently available.



REG is proud of its long-standing efforts to support the transition to lower carbon intensity fuels, and to provide a fuel diverse future for California, the United States, and the world.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Sens", written over a light gray grid background.

John Sens  
Sustainability Manager  
[john.sens@chervon.com](mailto:john.sens@chervon.com)