



MONTANA RENEWABLES™

Montana Renewables, LLC
1807 3rd St NW, Great Falls, MT 59404
<https://montana-renewables.com/>

March 4, 2024

Via electronic submission to the Alternative Fuels Portal

Dr. Steven Cliff
California Air Resources Board ("CARB")
1001 I Street
Sacramento, CA 95814

RE: Montana Renewables, LLC, LCFS Tier 2 Pathway Application #B0528
Response to Comment of Joshua Kehoe MD ("Commenter")

Dear Dr. Cliff,

Montana Renewables, LLC ("MRL" or "the Company") provides this response to the comment of the above referenced Commenter. The Commenter has commented on the economics of shipping our fuels to California compared to other jurisdictions.

We appreciate the Commenter's interest in our application. We note first that Section 95488.7(d)(5)(A) of the Low Carbon Fuel Standard Regulation¹ states: "Only comments related to potential factual or methodological errors will require responses from the fuel pathway applicant." The Commenter has raised neither factual nor methodological errors in MRL's fuel pathway application; as such, we do not believe any action on our part is required and request that CARB certify our pathways without changes.

Without prejudice to our belief that no response is required, we wish to address the Commenter's comment. We recognize that other jurisdictions provide incentives for low carbon fuels such as ours. To be clear, our application currently pending before CARB will, if certified, simply offer the opportunity for MRL's renewable diesel, renewable naphtha and alternative jet fuel products to participate in the incentives of the California Low Carbon Fuel Standard program. Since all sales by MRL are complete upon loading of railcars at our Great Falls facility, the choice of ultimate destination will be made by MRL's customers based on their own operational and commercial needs and arrangements.

We appreciate the opportunity to address the Commenter's comment. We reiterate our belief that no changes to MRL's pathway application are required by this comment and request that CARB proceed with approving and certifying our pathways.

Regards,

Greg Staiti
Compliance Director, MRL

¹ Title 17 of the California Code of Regulations, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 7