

To the Commonwealth of Massachusetts

Subject: APS Comments

AMERIGreen Energy would like to provide comments to this very exciting and important initiative sponsored by the Commonwealth of Massachusetts, DOER. As distributors of biodiesel throughout the Mid-Atlantic and Northeastern regions of the United States, AMERIGreen Energy feels that there are some opportunities that might be lost if a few of the items regarding feedstock choice are not addressed properly.

Biodiesel is one of the most diverse fuels in the world, produced using a broad mix of resources including recycled cooking oil, agricultural oils and animal fats. This has helped shape a nimble industry that is constantly searching for new technologies and feedstocks. Industry demand for new alternatives is stimulating, and often financing, research on new feedstocks such as algae and camelina.

Made from recycled cooking oil, plant oils and animal fats, biodiesel is the first and only EPA-designated Advanced Biofuel with commercial-scale production across the country. To date, it has accounted for the vast majority of Advanced Biofuel delivered under the Renewable Fuel Standard (RFS). With refineries in nearly every state of the country and tremendous untapped production capacity, the industry is poised for expansion under a strong and growing RFS.

According to the EPA, biodiesel reduces lifecycle greenhouse gas emissions by 57 percent to 86 percent compared to petroleum diesel. The California Air Resources Board recently corroborated this analysis with similar findings. With more than 12.9 billion gallons used through 2016, biodiesel has cut carbon pollution by 120 million metric tons – the same impact as removing more than 25.3 million passenger vehicles from America's roadways. Additionally, the EPA consistently cites reduced tailpipe emissions as a benefit of using biodiesel blends in place of petroleum diesel fuel. Substituting higher amounts of biodiesel for traditional diesel fuel is the simplest, most effective way to immediately reduce harmful emissions.

Limiting feedstock availability in any program could unjustly limit supply optionality and potentially reduce the Commonwealth's ability to procure biodiesel, based on quality as opposed to simply the value of an AEC. Ultimately the Commonwealth of Massachusetts can incorporate the benefits of reducing greenhouse gas emissions with the providing the greatest available supply of quality biodiesel.

The National Biodiesel Accreditation Program (NBAC), called **BQ-9000®**, is a cooperative and voluntary program for the accreditation of companies that produce, test, and supply biodiesel fuel. The program is a unique combination of the ASTM standard for biodiesel, ASTM D6751, and a rigorous quality systems program that includes storage, sampling, testing, blending, shipping, distribution, and fuel

management practices. BQ-9000® is open to any biodiesel manufacturer, marketer or distributor and now retailer of biodiesel and biodiesel blends, as well as third party labs who test the fuel, in the United States and Canada. Protecting the integrity of the supply chain is critical in protecting the heating systems of Massachusetts's residents.

Please consider the federal RFS program and their feedstock pathways as the standard by which Massachusetts incorporates this program, the results would bring more competitive pricing balance and additional high quality biodiesel options available to your citizens.

Sincerely,

Michael Devine
AMERIGreen Energy