

## World Energy (Scott Lewis)

Please find attached for World Energy's comments in response to the Proposed Amendments to the California Cap-and-Invest program. Thank you for your consideration.



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Rajinder Sahota  
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**RE: World Energy’s Comments on the Proposed Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (Cap-and-Invest Program)**

Dear Ms. Sahota and CARB Staff,

World Energy appreciates the opportunity to provide comments on the proposed amendments to the Cap-and-Invest Program. We thank CARB staff for their work throughout this rulemaking process and for the consideration of extensive stakeholder feedback.

World Energy is one of the largest and longest-serving advanced clean energy suppliers in North America. We were the world’s first producer of sustainable aviation fuel (SAF) and remain leaders in the field of renewable fuels.

World Energy would like to provide the following comments on proposed amendments that have implications for the SAF market.

**Additional Clarity Suggested for Section 95852.1**

To ensure clarity regarding the use of renewable fuels, we recommend a minor but essential clarification. Given that SAF accounting varies significantly across international and voluntary GHG programs, we interpret § 95852.1 as a mechanism to prevent double counting. To protect from double counting, we recommend specifying that a compliance obligation may only be claimed against a regulatory compliance requirement. Explicitly, adding the term “regulatory” provides the necessary guardrails, especially as frameworks like the

Carbon Offsetting and Reduction Scheme for International Aviation (CORSA), could be adopted in the future and potentially integrate with regulatory programs, like Cap-and-Invest. We are specifically proposing the term “regulatory” to avoid conflation with other “compliance” programs, like CORSA. The suggested change is as follows, with the addition in bold and underlined text:

§ 95852.1 An entity claiming use of an exempt biomass-derived fuel must have sole ownership or contract rights to the biomass-derived fuel and any associated emissions exemption or emissions reductions attributed to the use of the fuel such that no other entity may claim an emissions exemption to reduce a compliance obligation or otherwise claim a [**regulatory**] reduction in emissions associated with the use of the biomass-derived fuel.

### **Including SAF in Section 95852.2**

In alignment with the exemptions for other biomass-derived fuels under § 95852.2, we recommend that CARB staff extend this exemption to include all SAF. Currently, the regulation only exempts SAF when produced as a co-product of renewable diesel. This creates a narrow technical distinction that does not account for industry growth and change, especially as new facilities are being designed to solely produce SAF. Explicitly including SAF as an exempt fuel will ensure that the regulation remains future-proof and does not inadvertently penalize SAF-only production.

These two proposed changes offer small but vital distinctions for the SAF industry. By anticipating future challenges as the market expands, our recommendations refine the existing regulation without altering its core intent. Adding these specific details ensures the program remains adaptable as the SAF market grows and prevents minor technicalities from causing major disruptions.

The Cap-and-Invest Program remains a cornerstone of California’s climate policy and leadership. We appreciate CARB’s commitment to refining this program and ensuring it continues to drive ambitious emissions reductions.

Sincerely,

Scott Lewis  
President, World Energy Net-Zero Services