

**Advanced Biofuels Coalition
Comments Submitted
On
New Jersey Energy Master Plan**

**July 25, 2008
(filed electronically)**

On behalf of the Advanced Biofuels Coalition (Coalition), we appreciate this opportunity to submit written comments to the state of New Jersey regarding the draft Energy Master Plan (NJEMP). The NJEMP proposes the course for developing solutions and taking actions that address energy and environmental challenges in the state. Specifically, the Coalition submits these comments on Goal 3; Action Item 3, which calls for increasing the amount of biofuels and biomass in the State's energy portfolio.

The state of New Jersey appropriately recognizes the importance and need for diverse availability of options for heating oil and other fuel demands. The proposed action item and implementation strategy to the energy master plan would set the goal to create a 2% biofuel standard for all sales of heating oil in New Jersey beginning 2010 and increasing to 5% by 2020. The Coalition conditionally supports this effort with the qualification that any biofuel standard established in the state is feed-stock neutral, technology neutral and product neutral to ensure that the widest range of potential fuels is eligible for meeting the standard. The Coalition recommends that, in developing such standard, the state incorporate as wide definitions of biomass feed-stocks used to make the biofuel and bio-based products, including co-processing technologies using renewable or recyclable feed-stocks, that can be blended to heating oil as feasible. The Coalition recognizes that specifications may be incorporated into the standard to ensure the biofuels meet quality and performance requirements. The Coalition recommends that any specifications established or used by reference incorporate as wide a spectrum of bio-based fuels and bio-products as practical.

The Coalition represents a wide range of biofuels and technology companies primarily engaged in making next-generation biomass-based and renewable fuels. These fuels will include biomass-based renewable diesel fuels and diesel fuel substitutes that could be used in heating applications. The Coalition's members have a number of different technologies covering process pathways to make fuels from a wide range of biomass and renewable feedstocks, including cellulosic materials, sugars, starches, vegetable oils/animal fats, and municipal waste products. These

technology pathways provide an opportunity for production of large scale volumes of renewable distillate fuels beyond traditional biodiesel. Next generation biofuel products will meet and often exceed quality standards for liquid fuels typically used in transportation and heating applications.

The Coalition is open to working with the state of New Jersey to assist in developing the biofuel requirement as part of the Energy Master Plan. We would be available to present additional information about our members technologies and biofuels, and to help with appropriate language to put the biofuel plan into place.

If there are any questions regarding our comments on the draft NJEMP, please feel free to contact us at 703-891-4812.

Respectfully submitted,

John Kneiss
Director of Technical & Regulatory Affairs
Advanced Biofuels Coalition
Hart Energy Consulting
1749 Old Meadow Road, Suite 301
McLean, Virginia 22102
703-891-4812