



November 2, 2016

Loan Programs Office  
RE: RIN-1901-AB38  
1000 Independence Ave, S.W.  
Washington, DC 20585-0121

RE: Comments on proposed changes to 10 CFR Part 609 Loan Guarantees for Projects That Employ Innovative Technologies

Dear Sir or Madam:

Siluria Technologies, Inc. ("Siluria") submits these comments in response to the proposed changes to 10 CFR Part 609 Loan Guarantees for Project That Employ Innovative Technologies (RIN-11901-AB38) issued by the Loan Programs Office ("LPO") in the Department of Energy ("DOE").

Section 609.11 (c) of the proposed change describes a fee referred to as a "Risk-Based Charge". However, it is unclear if this "Risk-based Charge" is simply renaming the existing credit-based interest rate spread<sup>1</sup>, or imposes a new fee. If the latter, the imposition of any supplemental fees beyond what is currently contemplated in the existing program for applicants and borrowers would likely make many projects infeasible and have potential significant impact on the loan program as a whole. We kindly ask for clarification or reconsideration of this proposed fee.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "David J. Zaziski".

David J. Zaziski, Ph.D.  
Director, Government Affairs  
Siluria Technologies, Inc.

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<sup>1</sup> The credit-based interest is defined in the DOE notice titled "Credit-based Interest Spread For Title XVII".