

PRESS RELEASE



February 10, 2023

RNG Coalition Submits RFS Comments to EPA

Washington, DC – Today, the Coalition for Renewable Natural Gas (RNG Coalition) submitted comments to the Environmental Protection Agency (EPA) regarding the Agency's proposed Renewable Fuel Standard (RFS) "Set" rule. The proposal seeks to establish renewable fuel volume standards for 2023-2025, create a framework for e-RINs, and implement programmatic changes and reforms.

"RNG Coalition has worked with EPA to ensure a stable RFS that incentivizes growth for RNG and biogas. We believe the comments submitted today are the path to get there," said Johannes Escudero, Founder & CEO of RNG Coalition. "Accurately accounting for the existing and planned RNG growth for 2023-2025, carryover RINs, and the market impact of eRIN generation is essential. We ask EPA to take the time and consideration needed to review, and look forward to their response."

Particular points of urgency RNG Coalition requests EPA to address include:

- Finalize more robust cellulosic biofuel and advanced biofuel volumes for 2023-2025, that reflect the maximum achievable volumes;
- Even when determining what is "achievable," recognize the strong, potential growth of Renewable Natural Gas ("RNG") by using at least a 30% growth rate for projecting RNG used in CNG/LNG vehicles, not limiting projections of eRINs from RNG and biogas to renewable electricity based on ability to process registrations, and accounting for all potential fuels that may become available in this time frame;
- Incorporate a mechanism in the final rule that will allow for upward adjustments in the case of new fuels or underestimates in projections;
- Implement a program for generation of eRINs that allows RNG producers to be the RIN generator, reduces burdens on feedstock providers, and ensures flexibility in the market;

- Retain the current flexibility allowed for RIN generation and compliance with respect to RNG and delay the implementation of any biogas regulatory reforms to until at least January 1, 2025 to allow continued discussions with stakeholders;
- Continue to allow for storage while registration approvals are pending; and
- Support innovation and creation of additional markets for RNG, including, but not limited to, hydrogen, sustainable aviation fuel, and methanol.

"RNG plays an important role in our clean energy future," said David Cox, RNG Coalition Founder & CFO. "With appropriate changes to its proposal, EPA can ensure we have the tools we need to continue to grow and make a positive impact."

RNG captures methane and other biogases that would otherwise escape fugitively into the atmosphere or be flared (wasted) from organic waste streams across North America and converts that biogas into RNG. RNG is fully fungible with conventional natural gas and is used as a direct renewable substitute for most transportation, commercial, industrial, and residential natural gas applications. There are currently 276 RNG facilities in the US and Canada, with another 114 projects under construction and 150 in the planning process.

Coalition for Renewable Natural Gas is the non-profit association of renewable natural gas in North America. Membership is comprised of 390+ companies, labor organizations, municipalities, colleges, and universities. Find out more at: www.rngcoalition.com

###

PRESS CONTACT

Lesley Dalton

Lesley@RNGCoalition.com

646.322.4213



[Visit our Website](http://www.rngcoalition.com)

Follow the RNG Coalition on Social Media

