

September 21, 2023

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: Support for the Low Carbon Fuel Standard

Dear Chair Randolph and Members of the California Air Resources Board,

California has been at the forefront of environmental policy in the United States, and as the first legislative body in the world to introduce a Low Carbon Fuel Standard (LCFS) the state has been instrumental in reducing greenhouse gas emissions and has paved the way for more sustainable and environmentally friendly energy sources. Further, the state's LCFS program has led to governments around the globe to introduce similar legislation.

One of the cornerstones of the state's successful LCSF model is its reliance on the GREET (Greenhouse gases, Regulated Emissions, and Energy use in Transportation) model for carbon accounting. This choice is not only well-founded but also widely accepted as the most rigorous and scientifically credible methodology for assessing the carbon footprint of transportation fuels. The GREET model has consistently provided a robust foundation for measuring emissions, making the state's LCFS program both reliable and transparent in the area of carbon accounting.

Another important aspect of the LCFS program is the emphasis on avoided methane crediting. By recognizing and rewarding the reduction of methane emissions, the program has incentivized the industry to adopt cleaner practices and technologies. This tangible reduction in greenhouse gas emissions is a primary indicator of the LCFS program's real-world impact and its alignment with the broader goal of mitigating climate change.

Furthermore, the Biomethane Book & Claim system is a vital component of the LCFS program that deserves recognition. This system not only aligns with renewable electricity standards but also plays a crucial role in ensuring a consistent and robust supply of biomethane. It empowers consumers and stakeholders to make informed choices, promoting transparency and accountability in the renewable energy sector.

As you and your fellow board members review the state's Low Carbon Fuel Standard program, I hope you will consider the important facts that I have outlined above.

Sincerely,



Neil H. Smith, CEO
Vanguard Renewables

CC:

Steve Cliff, Executive Director
Rajinder Sahota, Deputy Executive Director for Climate Change and Research
Matt Botill, Division Chief