



**BerQ RNG**  
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September 26, 2023

Via Email: [Liane.Randolph@arb.ca.gov](mailto:Liane.Randolph@arb.ca.gov)  
The Honourable 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,

On behalf of BerQ RNG, I am writing to you to emphasize our support for the Low Carbon Fuel Standard (LCFS). Specifically, the usage of the GREET model, Book & Claim accounting and the reductions in GHG emissions from avoided methane crediting. BerQ RNG currently has several dairy digester manure to RNG projects in operation in Michigan and New York, all under contract to sell RNG as CNG as a vehicle fuel in California and have received pathway applications approvals under the temporary CI pathway for dairy CNG. More importantly, BerQ RNG is in the process of constructing and developing a large number of dairy and swine greenfield manure to RNG projects located outside of California that we intend to deploy well in excess of \$100 million in capital to capture and beneficially use manure currently being deposited in lagoons and emitting greenhouse gasses into the atmosphere. The LCFS is the economic engine that drives BerQ RNG's investment in these projects and results in significant operational and financial benefits to our host farm partners and proposed changes that adversely impact our ability to participate in the LCFS going forward will make these capital deployment decisions much more challenging.

The GREET model is an excellent tool to quantify the greenhouse gas reductions and emissions from fuel that is registered under LCFS because it is a standard data-oriented approach that tracks energy resources from feedstock through end use. This science backed means of establishing precise GHG emission reduction potential is recognized as the industry standard and is designed to adapt to evolving technology and information so it will continue to be a useful tool in the future as well.

The use of Book & Claim accounting for RNG involved in LCFS allows the program to be more robust and is consistent with other greenhouse gas emission reduction programs all over the world. Its use allows the RNG to cross state boundaries and ignore artificial geographic constraints in order to deliver power to where it is needed most. Book & Claim is effective to confirm the origin (and associated environmental performance) of RNG across jurisdictions, which ensures that procurement methodologies and sources are reliable. Using Book and Claim is vital to allow the widespread, distributed buildout of renewable resources that can utilize existing energy delivery infrastructure. Without this, many renewable energy projects would not be able to continue operations or to be developed.

Avoided methane crediting related to LCFS participation is directly responsible for reductions in greenhouse gas emissions. Credits for RNG producers makes it possible for our projects to be developed and operated. This allows companies, like BerQ RNG, to capture biogas that would otherwise be vented to the atmosphere and produce clean, energy dense, RNG. The reduction in greenhouse gas emissions from this process would not be feasible without the LCFS program for most projects.

Sincerely,

  
Martin L. Ryan  
EVP & Chief Legal Officer

CC:

Steve Cliff, Executive Director  
Rajinder Sahota, Deputy Executive Director for Climate Change and Research (via email to [Rajinder.Sahota@arb.ca.gov](mailto:Rajinder.Sahota@arb.ca.gov))  
Matt Botill, Division Chief (via email to [Matthew.botill@arb.ca.gov](mailto:Matthew.botill@arb.ca.gov))