



September 26, 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,

DVO is a US-based vendor to the renewable energy industry with over 20 years of experience providing anaerobic digesters and other technologies that capture and convert methane to renewable power and fuels. With over 150 digester vessels installed to date, mostly on agriculture-based settings, DVO has the largest number of installations worldwide.

In recent years, we have observed firsthand the growth in the renewable energy industry and associated reductions in GHGs – much of it attributed to the success of the LCFS program. We believe removal or elimination of key aspects of the LCFS program will severely undermine progress gained to date in existing GHG reduction projects and those under development. As a result of a clear policy mandate by CARB to extend and strengthen the LCFS program, DVO is seeing a loss in investor and developer momentum that will hamper the ability of California to meet its GHG reduction goals. Without the support of the LCFS program, including its avoided methane feature and increased carbon reduction targets, developed methane capture projects will become economically non-viable, risk abandonment, significant investment will languish, and release of otherwise avoided GHG's to the atmosphere will result.

Debate and understanding of affected stakeholders' positions and concerns is important to optimizing and fine tuning most programs. Having stated that, we urge CARB to increase the carbon intensity reduction goal to at least 35% by 2030. We also recommend CARB retain the current programmatic framework for RNG and eLCFS.

The LCFS program is considered by most a success. Our view is that clear and concise direction by key policy leaders such as CARB is important to the growth of renewable energy industry.

Sincerely,

A handwritten signature in black ink that reads "Melissa VanOrnum". The signature is fluid and cursive, with a long horizontal line extending to the right from the end of the name.

Melissa VanOrnum  
Vice President - Marketing

CC:

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

