



# RED TRAIL ENERGY, LLC

**“Our Farms, Our Fuel, Our Future”**

PO Box 11 Richardton, ND 58652 (701)-974-3308 FAX (701)-974-3309

February 25, 2020

Mr. Jim Duffy  
California Air Resources Board (CARB)  
1001 I Street  
Sacramento, CA 95814

Dear Mr. Duffy:

Subject: Response to Comments regarding Tier 2 Pathway Application No. D0005

**Public Comment Requiring Response:**

*“The energy credit from distiller grains (DDGS or MDGS) is not totally valid in the pathway calculations. When distiller grains are fed to cattle there are associated methane emissions, both enteric and from the resulting manure. These emissions must be included in the Life Cycle Assessment for the carbon intensity of the project’s corn ethanol. The project cannot count negative carbon emissions from CCS while not counting the actual emissions of methane from the cattle, chicken or hog operations that consume the distillers grain.”*

**RTE Response:** RTE followed the CARB life-cycle calculator, and this issue was already dealt within the 2018 LCFS rulemaking.

Please contact me with any questions at (701) 974-1105 or [dustin@redtrailenergy.com](mailto:dustin@redtrailenergy.com).

Sincerely,

Dustin Willett  
Chief Operating Officer  
Red Trail Energy, LLC

DW