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Rajinder Sahota
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Comments on the Cement Sector Net-Zero Emissions Strategy Workshop: Identifying Barriers

Dear Ms. Sahota:

Thank you for the opportunity to comment on the Cement Sector Net-Zero Emissions Strategy Workshop: Identifying Barriers. A key barrier to decarbonizing cement, as recognized at the workshop and pursuant to SB 596, is fuel switching. We strongly support efforts to decarbonize cement and achieve net-zero emissions throughout California, including through the use of state-of-the-art anaerobic digestion of organic waste resources.

True North Renewable Energy, LLC (TNRE) develops, builds, and operates state-of-the-art organics-to-renewable energy facilities, including large-scale, regional high-solids anaerobic digestion infrastructure. These facilities reuse and repurpose organic resources diverted from landfills to create beneficial, sustainable products, including biomethane and soil-amending compost. TNRE is focused on partnering with communities in California to meet local and state requirements for diverting organic waste from landfills and cutting short-lived climate pollutant (SLCP) emissions, while generating compost and renewable natural gas to help decarbonize other sectors of the economy and meet California's climate goals.

TNRE has consistently advocated for expanding eligibility under the Low Carbon Fuel Standard to allow low carbon fuels supplying industrial sources, like cement facilities, to generate credits and equal value as if that fuel were directed to the transportation sector. We believe this is the most equitable approach for fuel providers and offtakers alike - across many sectors - and would support continued development of low carbon fuels and increased access to biogas in stationary sources and the industrial sector. We encourage CARB to consider this approach as it develops amendments to the Low Carbon Fuel Standard.

However, we recognize such a change does not appear to be under consideration in the current set of amendments, in which case we encourage CARB to explore alternative strategies to achieve similar outcomes and objectives. We believe the next best approach may be to leverage the Cap-

and-Trade program and develop amendments to the program that would provide equal incentive for biogas displacing fossil fuels in the industrial sector as currently exists for that gas in the transportation sector. In the upcoming rulemaking, we encourage CARB to evaluate approaches under Cap-and-Trade that could incentivize the production of biogas and use in the cement and other industrial sectors.

We also hope CARB will identify additional measures in the Cement Sector Net-Zero Emissions Strategy to support fuel switching, including direct incentives, streamlined permitting, and effective implementation of related policies, like CalRecycle's SB 1383 regulations. Despite CalRecycle's regulations, many jurisdictions have yet to fully comply. Project developers like TNRE need feedstock agreements with municipalities or waste haulers in order to finance and execute a project - and ultimately develop and deliver increasing volumes of biogas needed to achieve the State's objectives, including those under SB 596.

Thank you again for the opportunity to comment on this workshop, and please do not hesitate to reach out with any questions.

Sincerely,

Gary Aguinaga
President
True North Renewable Energy, LLC