Re: Washington State 173-424 WAC, Clean Fuels Program Rule – Draft Carbon Intensity Lookup Table

April 28, 2022

BayoTech Hydrogen appreciates the Washington Department of Ecology's work in developing these proposed pathways for the Clean Fuel Standards, providing guidance and direction on the modeled carbon intensity of various types of alternative fuels.

However, we would like to express concern regarding a couple of points regarding the detailed provided in the Washington CFS Lookup Tables draft document.

- Page 3 on Table 4 there does not appear to be a specific pathway that recognizes the use of RNG sourced from Dairy and Swine biomethane, instead only recognizing landfill gas, or traditional fossil natural gas, which have significantly higher carbon intensity values.
- Page 10, Table 9 indicates Dairy/Swine biomethane, with a -150 CI value, but does not include a pathway for use in Hydrogen production.

We strongly recommend clarification and inclusion of a pathway for the use of Dairy / Swine RNG in the hydrogen SMR production process, as this can provide a highly cost effective means of reducing or eliminating carbon emissions from the produced H2.

Additionally, we recommend consideration or allowance of pathway applications for small, modular, non-centralized SMR production, that may effectively avoid the need for long distance transportation, liquefaction and large-scale H2 storage associated with centralized facilities.

We appreciate the opportunity to participate in the development of the Washington CFS program.

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About BayoTech

BayoTech is a full-service hydrogen production, delivery, and storage technology company, headquartered in Albuquerque, New Mexico. BayoTech is disrupting the established centralized hydrogen supply chain with a new, highly efficient model of local hydrogen production hubs. Producing on a small scale with our unique technology, BayoTech is making reliable, cost-effective, low-carbon hydrogen accessible today.