Coalition for Renewable Natural Gas

Thanks very much, and good morning everyone. My name is Sam Wade, director of public policy with the Coalition for Renewable Natural Gas. We serve as the advocacy and educational voice for the RNG industry in North America. We have over 350 members, including many with operations in Washington, and we represent 98% of the pipeline interconnected RNG projects in the US. Our goal is to ensure that the methane emissions currently produced by society's organic waste streams are instead captured for productive uses, biomethane, hydrogen, electricity, or as a feedstock for other biologically-derived fuels. Our industry reduces methane emissions by improving the management of organic waste in the circular carbon-neutral fashion. We are strongly supportive of clean fuel policies, and commend Washington for their leadership on this program, and thank the staff for all of their hard work thus far. We support the draft rules inclusion of the most stringent targets possible by statute, 20% level starting in 2034. We also advocate for all sustainable production pathways and end uses for RNG. We believe that RNG could do more to help Washington achieve its low carbon goals in the CFS. If appropriate flexibility is offered in the final rules, the RNG industry can expand beyond its critical role as a fuel for the small, but hopefully growing Washington CMG and LNG vehicle fleet to also serve as a key input into making liquid fuels hydrogen, and to providing electricity for electric vehicles. These types of changes would reinforce recently enacted federal tax credits for such activities, and the Inflation Reduction Act, which we were also strong proponents of, and would align Washington's incentives with federal incentives. We'll provide written comments with ideas about how to help make this happen in the final rule. Thanks again for the chance to provide input today.