



1730 South St. | Redding, CA | 96001

December 13, 2024

Adam Saul

Washington Department of Ecology

300 Desmond Drive SE

Lacey, Washington

Re: Notice of Opportunity to File Informal Comments on Proposed Update to Clean Fuel Standard Program Rules (173-424 WAC)

Dear Mr. Saul,

I am writing on behalf of Maas Energy Works (MEW), a family-owned business based in Redding, California. We develop, own, and operate on-farm renewable energy facilities in partnership with dairy families to create biogas from cow manure and other organic wastes. MEW actually began its first operations in Washington State and is a partner in three western Washington digesters.

We are concerned about the proposed rules for Washington's Clean Fuels Program and their impact on existing digester facilities. Early adopters of anaerobic digester technology made substantial investments under challenging economic conditions. Since we first invested in Washington in 2009, electricity prices have fallen considerably, leaving many facilities struggling to cover operational costs. Participation in Oregon and California's Low Carbon Fuel Standard (LCFS) programs has been one of the only ways Washington digesters can try to remain operational—but access to those markets is difficult. So we have been hopeful that the CFP would provide a window for us to continue making investments in our Washington digesters.

However, the proposed Washington rules provide no meaningful support for existing digesters since avoided methane eligibility is phased out very quickly for assets placed in service years ago. Without access to incentives, these facilities cannot participate in the Washington market, jeopardizing their operations and the state's climate goals. The Pacific Northwest power markets alone do not provide sufficient revenue to sustain these projects. If no support is provided, many dairy farms may be forced to shut down their digesters, undermining efforts to reduce greenhouse gas emissions and support rural economies.



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We urge Ecology to include provisions that support existing methane avoidance projects and allow them to claim avoided methane benefits for as long as those benefits are real, voluntary, and additional. y. Providing stability and market confidence will continue to attract industry investment, which is essential for achieving the state’s decarbonization goals. Furthermore, MEW echoes the comments submitted to the Department of Ecology from the Coalition for Renewable Natural Gas (“RNG Coalition”).

Thank you for your dedication to this important work.

Sincerely,

Daryl Maas – CEO and Founder

Maas Energy Works