

## Puget Sound Energy

Thank you for the workshop/meeting today. Following up on the intersection of 3PV and book-and-claim. Abbey stated that this was still being worked on, and also that the Producer rather than the Reporter would be the obligated party for 3PV. As a practical matter, it will be expensive and logistically inconvenient to fly across the country to do multiple site visits in Minnesota, New York, etc. Also, it would seem that we would need to insert some language into our new contractual arrangements to ensure the site visit and 3PV generally would occur as those Producers otherwise have no incentive to comply. Existing contracts would also require amendment.

I've worked for years with CARB and its LCFS for an RNG fuel pathway to CA dispensing. Understand the need for confidence in the program and to prevent fraud, but I think the CA regimen you are leaning towards emulating is overly onerous in both time and money. At a minimum I urge you to consider dispensing with the verification step whereby one 3rd party verifies the work of another. The annual AFP report should be attested under penalty for any falsification. As with our tax returns, cannot Ecology use random auditing instead of redundant calculation/verification?