



MAAS

ENERGY WORKS

1730 South St. | Redding, CA | 96001

October 3, 2024

Mr. Adam Saul
Clean Fuels Program
Washington State Department of Ecology
via email

Subject: Comment on 173-424 WAC – Clean Fuels Program

Dear Mr. Saul,

Maas Energy Works is a founder/partner in Farm Power Northwest, Washington's leading dairy digester development company. Our company is active in developing and operating near 100 dairy digesters in over a dozen other US states. These facilities generate renewable natural gas (RNG) and electricity, purposed for use as carbon-negative vehicle fuel. Working with our partner families in the dairy industry, Maas Energy Works develops projects that support the Washington State Department of Ecology long-term goal of greenhouse gas (GHG) emission reductions, protect local air and water quality, create local jobs, and provide a new revenue stream along with other meaningful benefits to the dairy.

We fully support and endorse all of the comments submitted by the [Coalition for Renewable Natural Gas](#), particularly regarding their discussion of avoided methane crediting and book-and-claim accounting found on pages five and six of their submission.

In particular, two key points are important to dairy biogas development in Washington.

First, avoided methane crediting: Dairy methane receives this credit because we are capturing greenhouse gases that would otherwise escape into the atmosphere. Farmers are not required to capture these naturally occurring methane emissions, but our partner farmers do so because the Clean Fuels Program creates an incentive for capture this gas, in the form of avoided methane crediting under the CFP. It is this incentive that enables our company and our partner farmers to raise capital, and put funds at risk to build new biogas digester facilities on dairy farms. Our industry grows because there is a value placed on avoiding methane emissions and farmers can invest in facilities that will generate credits under the CFP. So we ask that Ecology avoid any policy changes that would place in question whether existing or future dairy digesters can receive avoided methane benefits under the CFP. If these incentives are removed, then the underlying economic motive for investing and maintaining these projects will be undermined, and digester projects will diminish or never be built.



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Second, book-and-claim accounting: This system is important for us to deliver gas to end markets without being constrained by local pipelines. Delivery of renewable gas to end users via book and claim accounting is a fair, well-recognized system supported for years by the EPA as the natural standard for delivering renewable gas under the Renewable Portfolio Standard. In rural areas, where many of us operate there are very few natural gas lines to deliver into, having access to broader markets through book-and-claim is essential. We request that Ecology avoid any CFP regulations that result in a practice of dividing up the country into small markets via rules against book and claim delivery of renewable natural gas benefits.

We commend Ecology's dedication to continuously improving the state's Clean Fuel Standard (CFS) program. As highlighted in our comments above, this is a timely opportunity to enhance the CFS framework for biomethane crediting, ensuring we maximize the greenhouse gas benefits derived from renewable natural gas on Washington dairy farms.

Warmly,

Daryl Maas, CEO and Founder