

Yanni Psareas

My name is Yanni Psareas. I'm the Legislative Affairs Manager for the RNG Coalition, and a resident of Vancouver, Washington. We're a national trade association representing approximately 400 member organizations who collectively produce 90% of all renewable natural gas in North America. We appreciate the opportunity to provide comments on the draft rule and we appreciate the department's leadership in advancing the clean fuel standard.

Our members are committed to advancing policies that reduce lifecycle carbon intensity in the transportation sector, and expand investment in methane mitigation and clean fuel deployment. While we strongly support the Clean Fuel Standard Program, the draft rules constraints on avoided methane crediting periods, and pipeline limits for RNG supply significantly constrain RNG developers' ability to help achieve the program goals. We're particularly concerned with the 15-year avoided methane crediting period that falls short of what's needed to support viable RNG project development in Washington.

Most projects in agricultural and organic space are underwritten based on crediting over 20 to 30 years. Capping this at 15 years, especially when paired with Washington's lower credit values, will chill investment and undermine the program's ability to drive real methane reductions. Second, we urge Ecology to remove pipeline deliverability restrictions. RNG, once injected into the pipeline, is indistinguishable from fossil gas and should be treated as fully fungible.

These limits introduce unnecessary complexity, raise costs for Washington fleets, and disconnect our program from broader North American RNG markets. Finally, we respectfully encourage Ecology to reflect HB1409's passing and the direction to align with other jurisdictions, particularly California, by adopting a harmonized framework that ensures stability for clean fuel markets and investor confidence in Washington state.

Thank you very much for the opportunity to comment.