



June 17, 2026

Washington State Department of Ecology
Climate Pollution Reduction Program

**RE: RNG COALITION Comments on Clean Fuel Standard Rulemaking –Transportation
Electrification Workshop**

The RNG COALITION appreciates the opportunity to submit comments in response to the Washington State Department of Ecology's Clean Fuel Standard Rulemaking workshop on Energy Economy Ratios and Transportation Electrification, held on May 27, 2026.

The RNG COALITION represents the renewable natural gas industry across North America, including hundreds of companies throughout the renewable gas supply and value chain. Our members support the development and deployment of renewable natural gas for decarbonization solutions across various sectors.

We appreciate Ecology's commitment and purpose behind this current rulemaking to strengthen the CFS and find new ways to decarbonize Washington State. As Ecology continues this rulemaking, RNG COALITION encourages the Department to consider how the CFS can support low-carbon electricity resources, including RNG-to-power and biogas-to-power projects, where those resources contribute to transportation electrification.

Under RCW 70A.535.080¹, electric utilities are required to use revenues from CFS credits for transportation electrification projects. Ecology and the Washington State Department of Transportation also play an important role in identifying eligible or approved project categories that can maximize public benefit. The RNG COALITION requests Ecology to evaluate opportunities for CFS utility revenue to support infrastructure for low-carbon electricity generation from RNG and biogas that supports electric vehicle charging.

Biogas-to-electricity and RNG-to-electricity projects can provide dispatchable, low-carbon electricity that complements intermittent renewable resources and helps serve transportation loads during periods of peak demand or grid constraint. In Washington, this can be especially important during winter periods when electric demand is elevated due to heating needs and

¹ <https://app.leg.wa.gov/RCW/default.aspx?cite=70A.535.080>

when the regional power system may face seasonal constraints related to hydropower availability, transmission, and overall resource adequacy.²

Low-carbon electricity produced from biogas and RNG is produced by capturing methane from sources like landfills, wastewater treatment facilities, and food and agricultural waste; gases that would otherwise escape into the atmosphere. Methane is a highly potent greenhouse gas, with more than 28 times the global warming potential of CO₂ over a 100-year period. Capturing and destroying methane through RNG production therefore yields outsized climate benefits in the near term. In this respect, biogas-to-electricity and RNG-to-electricity projects can advance multiple state policy objectives at once: reducing transportation emissions, supporting electric vehicle deployment, decarbonizing electricity generation, and reducing methane emissions from organic waste streams.

RNG COALITION therefore encourages Ecology to evaluate opportunities for the CFS that incentivizes RNG-to-power and biogas-to-power projects to contribute to transportation electrification. This investment could help low-carbon RNG-to-power and biogas-to-power resources support EV charging, and other transportation electrification applications, while also advancing broader electricity-sector decarbonization objectives.

This approach is consistent with the purpose of the CFS and this workshop's stated interest in supporting transportation electrification, maximizing public benefit, and exploring ways the program can support decarbonization of electricity generation. It would also provide utilities with clearer regulatory direction to use revenues not only for charging equipment, but also for the upstream grid and generation infrastructure necessary to ensure that transportation electrification is served by low-carbon electricity.

The RNG COALITION respectfully encourages Ecology to further examine how RNG-to-power and biogas-to-power resources, and the infrastructure needed to deliver them, can support transportation electrification. Considering these opportunities in the rulemaking would help ensure that the CFS supports both near-term transportation electrification and deeper lifecycle emissions reductions across Washington's transportation, electricity, and waste sectors.

Thank you for your ongoing work on this rulemaking and for the opportunity to provide comments.

/s/

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² <https://www.nwcouncil.org/news/2025/05/02/pacific-northwest-load-forecast-2025/>

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