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September 30, 2026

Lauren Sanner
Climate Rulemaking Planner
Washington State Department of Ecology
Climate Pollution Reduction Program
P.O. Box 47600
Olympia, WA 98504-7600

RE: Comments on Carbon Intensity Targets 2028–2038, Chapter 173-424 WAC and WAC 173-455-150

Dear Ms. Sanner:

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 began its first operations in Washington State and remains a partner in three western Washington digesters.

MEW appreciates the opportunity to provide comments on the Washington Department of Ecology's discussion paper regarding carbon intensity targets for 2028 through 2038. MEW supports the comments and overall direction submitted by the RNG Coalition on these questions. In particular, we support the following:

1. Which scenario do you prefer: A, B, or C?

MEW supports Scenario A, the strongest near-term schedule presented. Its 4% reduction in 2028 would provide an early, clear signal for investment in low-carbon transportation fuels, including renewable natural gas (RNG). A predictable state schedule is especially valuable to developers planning projects that take years to finance and build. Scenario A would advance those investments and deliver emissions reductions sooner while reaching the required 45% reduction by 2038.

2. Do you prefer a more gradual schedule or a less gradual schedule? Why?

MEW prefers the less gradual schedule in Scenario A. Advancing reductions in 2028 encourages fuel production and deployment sooner, when those investments can deliver emissions benefits over more years. Scenario A also gives fuel producers and regulated

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parties a defined annual schedule through 2038. Ecology's analysis should account for existing and potential RNG supply, credit generation, and the lead times needed to develop new projects.

3. Are there alternative scenarios you would like Ecology to consider?

MEW supports Scenario A as the most ambitious of the proposed schedules for reaching the 45% reduction by 2038. We also encourage Ecology to model the potential 55% reduction described in the discussion paper and explain how it will evaluate the statutory conditions for considering that target in the future. If those conditions are met, Ecology should act promptly to consider a stronger standard or create a mechanism for an automatic adjustment.

Thank you for the opportunity to provide comments.

Sincerely,

Dallas Spiecker
Public Affairs and Marketing Communications

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