



May 4, 2026

Lauren Sanchez
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Proposed 15-Day Changes to Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms

Dear Ms. Sanchez:

On behalf of Amp Americas (“Amp”), we appreciate the opportunity to provide feedback on the 15-Day Changes to the proposed amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms Regulation (the “Cap-and-Invest Regulation”).

Amp supports Mandatory Greenhouse Gas Reporting Regulation (“MRR”) and Cap-and-Invest (C&I) Program as important elements of the State’s overarching climate change framework, and we generally support the proposed amendments to update the programs in line with legislative direction and to provide ongoing market certainty. We support and align our comments with those of the Coalition for Renewable Natural Gas (“RNG Coalition”) and offer the following brief comments to highlight Amp’s most significant priorities.

About Amp Americas

Founded in 2011, Amp develops and operates renewable natural gas (“RNG”) facilities that convert dairy waste into carbon negative renewable energy. Over our history, Amp’s projects have prevented over 2.8 million metric tons of carbon equivalent emissions. As a pioneer in the dairy RNG industry, Amp registered the first 5 dairy RNG-to-CNG pathways in California’s Low Carbon Fuel Standard (“LCFS”) and was the RNG supplier for the first 11 dairy RNG-to-hydrogen pathways. Our experience developing, operating, and reporting on these and other assets gives us a unique perspective on the impact CARB policy has on development of projects to reduce greenhouse gas (“GHG”) emissions.

Our projects and resulting methane and carbon dioxide (“CO₂”) reductions have been made possible by the California Air Resources Board’s (“CARB’s”) leadership in decarbonizing transportation, and we encourage CARB to continue to support the policy decisions that have made it so successful and build from them to reach other sectors covered under the Cap-and-Invest program.



Support Changes to Section 95852.1 Clarifying Compliance Obligation for Biomass-Derived Fuels

Amp supports the clarifying text in Section 95852.1, which ensures that CO₂ and methane benefits from biomethane projects are properly recognized, while preventing double counting of biogenic CO₂. These clarifications align with the program's broader objective of recognizing the full GHG benefits of RNG across end uses.

Remove 50% Fuel Cost Cap from MDI Allocation

Amp is generally supportive of the Manufacturing Decarbonization Incentive ("MDI") allocation and the inclusion of biomethane as an eligible technology. However, we echo concerns from the RNG Coalition regarding the 50% limit on support for biomass-derived fuel costs. The cost premium for renewable fuels is fuel-specific and fluctuates with market conditions, and an arbitrary 50% cap risks under-incentivizing RNG procurement when conventional fuel prices are low. We urge CARB to remove this 50% limit and instead structure the MDI to account for the full premium paid by industrial actors for low-carbon fuels above the cost of conventional alternatives and allow flexibility under the MDI provisions for facilities to utilize the crediting in a way that best supports their path to decarbonization.

Eliminate Unnecessary Complexity in Determining C&I RNG Eligibility

To reduce administrative burden and streamline RNG reporting, CARB should remove Section 95852.1.1 from the rule. Eliminating this unnecessary complexity would make RNG a more attractive compliance option for fuel end users and better support CARB's long-term strategy of reallocating RNG resources toward hard-to-electrify end uses.

Preserve Near-Term Use of Gas Utility Allowance Value for RNG Interconnection

Amp supports the continued use of natural gas utility allowance value to advance interconnection of RNG facilities to the gas grid. The Biomethane Monetary Incentive Program (BMIP)¹, funded in part through gas utility allowance value, has proven to be an effective tool for lowering RNG interconnection costs. As the gas utility allocation phases down to transition support toward electric utilities, as explained under Table 9-6A in the 15-Day Package, CARB should ensure a share of the remaining near-term gas utility value continues to support RNG deployment. Amp, in coordination with the RNG Coalition, recommends the Draft Rule explicitly direct the CPUC to dedicate a portion of the near-term gas utility allowance value for this purpose or, alternatively, allow utility rate basing of interconnection costs.

¹ <https://www.cpuc.ca.gov/industries-and-topics/natural-gas/renewable-gas>



Conclusion

Thank you for the opportunity to comment on the 15-Day Package. We support CARB in its efforts to maintain a strong C&I program, including more targeted efforts to decarbonize industry and enable biomethane to decarbonize stationary sources. We look forward to continuing to work with CARB staff throughout this process and other related efforts to achieve these outcomes.

Sincerely,

Cassandra Farrant

Cassandra Farrant

Head of Environmental Programs and Regulatory Affairs

Amp Americas