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November 10, 2025

California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: On-Road Heavy-Duty Engine and Vehicle Omnibus, Low Carbon Fuel Standard, and Emergency Vehicle Emissions Regulations

The Coalition for Renewable Natural Gas (RNG COALITION) is a California-based nonprofit organization representing and providing public policy advocacy and education for the Renewable Natural Gas (RNG) industry.[1] RNG COALITION respectfully submits these comments to the California Air Resources Board (CARB) in response to the *On-Road Heavy-Duty Engine and Vehicle Omnibus, Low Carbon Fuel Standard, and Emergency Vehicle Emissions Regulations* (Draft Rule).

We support RNG produced from all feedstocks, using all sustainable technologies, and for all sustainable end-use applications. The Draft Rule's proposal to allow linear generators to source RNG using book-and-claim accounting is reasonable and should be adopted.

Book and Claim of RNG to Linear Generators Should Be Allowed

The Draft Rule correctly recognizes that the framework for RNG/biogas to electric vehicle (EV) pathways could be further improved. Specifically, CARB is correct to be focused on how to incentivize the use of renewable resources in dispatchable power generation technology to serve EV load.

The Draft Rule offers targeted amendments that would allow linear generators—a low-emission[2] gas power generation technology—to employ the same proven book-and-claim accounting framework that has allowed natural gas trucks to access RNG. For an example of where this technology is already deployed in California, linear generators are now serving truck charging demand at The Denker Hub associated with the Port of Long Beach.[3]

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[1] For more information see: http://www.rngcoalition.com/

[2] We agree with CARB's language in the Draft Rule's Initial Statement of Reasons (ISOR) that says, "linear generators fueled with RNG would result in lower statewide PM and NOx emissions per Megawatt Hour (MWh) than grid electricity currently."
https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2025/orhdlcfs/app_f.pdf

[3] https://www.prologis.com/insights/success-stories/north-americas-largest-heavy-duty-ev-charging-hub-powered-microgrid

CARB Should Not Arbitrarily Sunset Book-and-Claim Accounting Until Another Functional Replacement Accounting Method is Developed

The Draft Rule would allow book-and-claim RNG accounting for linear generators, but only through December of 2035. This sunset for book-and-claim accounting is arbitrary, poorly justified and unnecessary. It is unclear as to what CARB staff believe these linear generators should do post 2035 (e.g., shift to another form of accounting, stop using RNG, shut down?).

Book-and-claim accounting is the globally accepted framework for tracking environmental attributes of gaseous fuels, analogous to the use of Renewable Energy Certificates (RECs) in electricity markets.[4] Book-and-claim accounting ensures verified environmental benefits (e.g., GHG reductions) are properly assigned to the buyer of the RNG that provides the financial incentive to construct and operate the RNG project, regardless of unavoidable comingling of fossil and renewable gas in pipelines.

The linear generator pathway demonstrates the importance of flexible accounting mechanisms for both renewable gas and power. RNG suppliers are smaller sources of gas, each linear generator's gas demand is individually modest and distributed, and EV load is also often distributed. Only through flexible accounting mechanisms—like book-and-claim for both gas and power—can this useful combination of technologies be properly recognized and incented under the LCFS.

We do not believe that a more appropriate accounting method will be developed by 2035, and thus the proposed sunset in the Draft Rule is inadvisable. That said, we are happy to engage with CARB staff on potential future alternative accounting methods.

Staff's Analysis of Expected Use of RNG in Linear Generators is Concerning

The CARB staff analysis in the ISOR of RNG adoption for use in linear generators is surprising. The analysis states that, "staff do not anticipate significant utilization of indirect supply of RNG matched to fossil natural gas nor increases in deployment of linear generators because the additional costs of procuring RNG in place of fossil natural gas would be high, and that in the absence of similarly high credit prices, these additional RNG procurement costs would not be fully compensated by the additional LCFS credit revenue that results from indirectly supplying RNG for linear generators."

Some RNG project developers read this statement and conclude that CARB's intent is to *not* incentivize the use of RNG in linear generators. We recommend that CARB find ways to

[4] https://static1.squarespace.com/static/53a09c47e4b050b5ad5bf4f5/t/6734fb7601771749d4c174d4/1731525495807/FINAL+Value+of+Biomethane+Certficates+Study+Complete+White+Paper+FINAL+for+Publishing+20241021+V1.pdf

retract/restate this potentially problematic framing. If LCFS prices do not incent additional RNG adoption, California will not be able to reach statutory goals for methane reduction from organic wastes. Other key tools promoting methane capture from organic waste to power production are being removed or degraded. For example, the California Public Utilities Commission appears to be planning to sunset the BioMAT program.[5] Federal tax credits, such as the Investment Tax Credit and Production Tax Credit, that have historically promoted renewable power projects are no longer available.[6,7]

Conclusion

Renewable natural gas is a reliable, immediately available, and scalable decarbonization tool suitable for use in linear generators and other end use applications currently creating transportation fuel. By fully incorporating RNG into the LCFS—including book-and-claim RNG to EV pathways that include linear generators—California can strengthen its leadership in the clean energy transition while delivering climate, economic, and equity benefits statewide.

Sincerely,

/s/

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[5] https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M586/K161/586161556.PDF
[6] https://www.epa.gov/green-power-markets/summary-inflation-reduction-act-provisions-related-renewable-energy
[7] https://warrenaverett.com/insights/one-big-beautiful-bill-energy-tax-credits/