



November 10, 2025

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

RE: Amp Americas' Comments on the Proposed Amendments to the On-Road Heavy-Duty Engine and Vehicle Omnibus, Low Carbon Fuel Standard Regulations, and to Permanently Adopt the Emergency Vehicle Emissions Regulations

Dear Chair Sanchez:

Thank you for the opportunity to comment on the Proposed Amendments to the On-Road Heavy-Duty Engine and Vehicle Omnibus, Low Carbon Fuel Standard ("LCFS") Regulations, and to Permanently Adopt the Emergency Vehicle Emissions Regulations. Amp Americas ("Amp") strongly supports the proposed amendments to the LCFS regulation, which will support the state's short-lived climate pollutant ("SLCP") and transportation electrification goals by creating additional opportunities for investment in methane mitigation and electric vehicle charging, especially for heavy-duty vehicles. Amp appreciates the California Air Resource Board's ("CARB's") leadership on the LCFS program, which is key to achieving the state's clean transportation goals.

ABOUT AMP

Founded in 2011, Amp develops, owns, and operates renewable natural gas ("RNG") facilities that convert dairy waste into renewable energy. Over our history, Amp's projects have prevented over 2.4 million metric tons of carbon equivalent emissions, and we plan to rapidly expand our impact over the next several years.

As a pioneer in the dairy RNG industry, Amp registered the first 5 dairy RNG-to-CNG pathways in California's LCFS program, and we were 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 investment and project development activity related to low carbon fuels. Our projects and resulting methane and carbon dioxide reductions have been made possible by CARB's leadership in decarbonizing transportation, and we encourage CARB to continue to support the technology-neutral, performance-based policy framework that has made the LCFS so unique and successful.

Support for the Proposed Amendments to the LCFS

We strongly support the LCFS program, which has been critical to advancing a wide array of climate and environmental priorities for California, including reducing methane from dairies. We are strongly supportive of the proposed amendments to expand the LCFS regulations to include book-and-claim



accounting for RNG used in linear generators to produce electricity for vehicle charging, similar to the way the program treats RNG used in fuel cells.

Linear generators fueled with RNG offer low-carbon or negative-carbon electricity for EV charging. They are a much needed, easily deployable alternative to grid-tied charging, circumventing potential bottlenecks that could slow down the adoption of electric vehicle infrastructure. By increasing opportunities for near-term clean and resilient charging solutions for the transportation sector the proposed amendment expands the solution set for overcoming current grid interconnection constraints and offers a valuable tool to accelerate California's ambitious decarbonization goals. The amendment also creates additional markets for RNG in a manner that aligns with the state's SLCP reduction and transportation electrification goals.

Per our previous comments,¹ we would support future amendments to the program to further expand book-and-claim access for biogas used in all EV charging pathways in order to further support the ZEV market and provide equal treatment between hydrogen and electricity pathways. We would also support amendments to allow RNG to serve as a feedstock into other fuel processes, similar to Canada's Clean Fuel Regulations, to support further carbon intensity reductions and SLCP-reducing projects.

Thank you again for the opportunity to comment on the proposed amendments and for your leadership supporting low carbon fuels for California.

Sincerely,

Cassandra Farrant

Cassandra Farrant
Head of Environmental Programs and Regulatory Affairs
Amp Americas

¹ <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7547-lcfs2024-UDFcN1YnWFQLfVcl.pdf>