



October 7, 2020

The Honorable Andrew Wheeler
Office of the Administrator
U.S. Environmental Protection Agency
William Jefferson Clinton Federal Building
1200 Pennsylvania Ave, NW
Washington, DC. 20460

Dear Administrator Wheeler:

It is my understanding that you recently received a letter from the Domestic Energy Producers Alliance (DEPA) asking you to take specific steps to reverse course and stymie the growth of America's Renewable Natural Gas (RNG) industry. On behalf of the Coalition for Renewable Natural Gas (RNG Coalition), we respectfully ask that you resist this call to deliberately harm our industry and continue the Environmental Protection Agency's (EPA) commendable efforts to promote the domestic production and use of RNG as an advanced and cellulosic biofuel.

The RNG Coalition is the trade association for the North American RNG industry. We advocate for the sustainable development, deployment and utilization of RNG so that present and future generations will have access to domestic, renewable, clean fuel and energy. The RNG Coalition has over 250 members¹ who represent the full value chain of cellulosic waste feedstock conversion to transportation fuel as regulated under the Renewable Fuel Standard (RFS), including producers of 95% of all the RNG in North America. Our members currently operate 130 RNG production facilities (119 in the U.S.), with 36 new production facilities under construction and another 62 projects that have already completed substantial development.

The growth of the domestic RNG industry and its ability to provide increasing volumes of advanced biofuel to meet the cellulosic biofuel requirements provided for in the Renewable Fuel Standard (RFS) is a success story. Due in large part to EPA's leadership, we have been able to capture greater volumes of harmful methane emissions at landfills, livestock and agriculture operations, municipal solid waste, food processing and wastewater treatment facilities that would otherwise be flared (and wasted) or escape into the atmosphere, and instead convert the waste product (methane) into a transportation fuel that is fungible with existing natural gas infrastructure and vehicles. RNG meets and exceeds the most rigorous environmental standards provided for under the RFS.

The predictability and reliability of programs like the RFS will play a critical role in our industry's ability to achieve our Sustainable Methane Abatement & Recycling Timeline (SMART) – an initiative to capture and control methane produced from more than 43,000 organic waste sites in North America by 2050. We are developing benchmarks for 2030 and 2040. As such, entrepreneurs at all stages of the RNG value

¹ A list of the RNG Coalition's membership is attached.

The Coalition for Renewable Natural Gas
750 Ninth St. NW, Suite 650
Washington, DC 20510

chain have made significant business and investment decisions based on existing statute, regulations and legal precedents that currently govern the RFS program. The abrupt and ill-advised changes to the RFS program called for by DEPA - aside from being dubious from a legal and policy perspective - would have the detrimental effect of causing RFS market disruption, wreaking undue havoc upon America's nascent RNG industry. This could lead to billions of dollars in stranded investments and runs counter to our shared objective of promoting the domestic production and use of advanced biofuels for the benefit of our environment and economy.

The RNG Coalition values and appreciates the positive relationship we share with EPA. Your agency's efforts have helped spur RNG to progress from a niche transportation fuel to a commercial scale cellulosic biofuel that is readily accepted and used in the marketplace. We look forward to continue working with you and your team on ways to protect and further improve the RFS program in ways that take full advantage of the environmental, energy and economic benefits associated with the continued growth of America's RNG industry.

Thank you in advance for your consideration of this letter. The RNG Coalition stands ready to work with you and your staff on this and any other issue regarding the RFS.

Sincerely,



Johannes Escudero
CEO & Executive Director
Coalition for Renewable Natural Gas
916.588.3033
916.520.4RNG (4764)
Johannes@RNGCoalition.com
RNGCoalition.com

Attachment

The Coalition for Renewable Natural Gas
750 Ninth St., Suite 650
Washington, DC 20001



RNG COALITION MEMBERSHIP



