



Coalition Comments:

**Proposed LCFS Amendments
to Implement SB 1505
Renewable Hydrogen
Provisions**

June 17, 2016

Respectfully Submitted to
California Air Resources Board
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Dear ARB Members and Staff,

Thank you for the opportunity to provide written feedback on ARB's proposed amendments to the low carbon fuel standard (LCFS) implementing SB 1505 renewable hydrogen provisions.

The Coalition for Renewable Natural Gas (RNG Coalition) is a not-for-profit association of companies and organizations dedicated to the advancement of RNG as a clean, green, alternative and domestic energy and fuel resource.

Simply put, we help ensure that waste isn't wasted.

Renewable Compressed Natural Gas and Renewable Liquified Natural Gas are ultra-low carbon fuels with approved pathways under the LCFS. The same biogas feedstocks that make R-CNG and R-LNG may be used to create renewable hydrogen.

In fact, renewable natural gas is an optimal source of renewable hydrogen. We urge that RNG should receive special attention during ARB's evaluation of incentives that may be offered to businesses and consumers to spur the development of clean sources of hydrogen fuel.

The use of RNG fulfills multiple California policy goals by 1) capturing and destroying methane, a highly potent short-lived climate pollutant from landfills; 2) displacing fossil fuels; 3) managing waste streams to reduce soil and water impacts; and 4) stimulating California's clean energy economy.

Consistent with the requirements of SB 1505, we urge ARB to encourage renewable hydrogen production and support renewable natural gas as a source of renewable hydrogen.

Thank you for your kind consideration.

Yours in Service,

David Cox
Director of Operations & General Counsel
Coalition for Renewable Natural Gas