

**From:** Brian Dolski <BDolski@bigoxenergy.com>  
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**To:** ARB LCFS Workshop  
**Subject:** Workshop comments

1. The definition of dairy related projects should include digesters that process predominantly dairy waste feedstocks, including but not limited to manure. Examples of dairy waste feedstocks should include fleshings, hides, paunch, slaughterhouse wastewater (blood), yard grit, milk processing waste, whey waste, cheese production waste, livestock feed production waste, etc.
2. Almost all RNG sales contracts include the biogas project/producer sharing a percentage of the LCFS credits or LCFS revenue with the off-taker (CNG retailer or fleet owner), and sharing rates have increased significantly over time as RNG supply has exceeded CNG market capacity. If the intent of SB 1383 is to provide some economic certainty for the development of dairy related biogas projects, the CfD or Put Option should not be tied to the LCFS credit price, but rather the project's net realized value (\$/MMBtu) from environmental attribute and fuel sales.

Regards,  
Brian



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