

October 16th, 2024



The Honorable Liane Randolph  
Chair California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph:

As a developer of dairy digester RNG and biogas-to-electricity projects for EV charging in West Coast states, Promus Energy appreciates the opportunity to comment on the second 15-day proposed changes to the CA Low Carbon Fuel Standard (LCFS). Promus values CARB's serious consideration and incorporation of feedback provided by us and other stakeholders as revisions to the LCFS program have been carefully crafted over the last several years. Finalization of the LCFS program rules package is urgently needed to bring the credit market into balance after three years of low values and provide sustained incentives for low-carbon fuels, especially the ultra-low CI fuels needed to achieve a 90% reduction by 2045. We urge you to approve the rules package without any further delay.

#### **Temporary CI Pathway for Biogas to Electricity Pathways**

While Promus is pleased to see CARB's inclusion of a temporary CI for low-CI electricity produced by dairy or swine biomethane, it is important that projects with generation technologies in addition to fuel cells be eligible for this temporary CI pathway. Promus requests that CARB include linear generators as eligible generation technology for a temporary CI pathway. Linear generators are a non-combustion technology that meet the strictest air emission requirements in CA. This is backed up by extensive publicly available data from dozens of source tests. The recently signed [AB 1921](#) recognizes linear generators in addition to fuel cells as renewable power technology that complies with CA's Renewable Portfolio Standard program. To ensure consistency across programs, CARB should make linear generators put linear generators on equal footing with fuel cells. Promus proposes that CARB replace "fuel cells" with "fuel cells or linear generators" in the final rule language to ensure that they receive the same treatment in the LCFS program.

We would also encourage CARB to consider making high-efficiency (> 40% electrical efficiency), low-NOX ICE genset projects that break ground during 2025 eligible for a temporary CI for projects as a practical transition to the non-combustion future, noting solid oxide fuel cell production is just getting geared up and will generally not be available until 2026 or 2027.

#### **Book and Claim Accounting of Biomethane for Electricity Pathways**

Similarly, Promus also urges CARB to extend Book and Claim accounting of biomethane for electricity generator to linear generators instead of only to fuel cells.

Linear generators have technological benefits that make them well-suited for applications with book and claimed biomethane being used to generate electricity to power EVs. Linear generators are fully dispatchable, have full turn-down capability, and have an emissions profile equivalent to a fuel cell. Fuel

cells on the other hand are not as readily dispatchable, limiting their use for EV charging with inconsistent electricity demand. This makes them particularly useful in helping to put more EVs on the road powered by electricity generated from biomethane.

In addition, Promus wants to ensure that the regulations for book and claim accounting of biomethane for electricity pathways have no impact on the book and claim eligibility of electricity generated from biomethane on-site at a dairy digester project.

Sincerely,

Dan Evans, President  
Promus Energy LLC  
1201 Third Ave., Suite 320  
Seattle, Washington 98101  
[dan@promusenergy.com](mailto:dan@promusenergy.com)  
206.300.0835