



July 9, 2021

Re: Climate Scoping Plan Revision

The undersigned parties write to share our perspectives on one major issue under consideration in the Scoping Plan proceeding. Our members utilize substantial amounts of natural gas in processing and manufacturing of commodities and consumer goods. Energy use and its climate impact is an important discussion and we are participating in the process to ensure the state recognizes the need for balanced energy solutions that also recognize economic feasibility.

As major consumers of natural gas, we agree with staff that electrification of commercial, industrial, and food processing sectors will prove difficult and is not feasible at this time. Several parties, including staff, however, have suggested that one potential solution is substitution of renewable natural gas (RNG). **We do not agree. RNG is five to ten times more expensive than fossil natural gas and is not a cost-effective solution.** Our businesses use substantial amounts of gas, primarily for thermal heat production and dramatic increases in cost are not economically feasible. Most of our members must compete in national and international markets. As a result, we do not support mandatory RNG mandates. We do support continued use of in-state biomethane from dairies, wastewater facilities and landfills as renewable low- or negative-carbon transportation fuel. The use of RNG as transportation fuel represents the highest and best use of methane captured from these facilities.

We are continuing to explore sustainable ways to reduce our consumption of fossil fuels, including energy efficiency, solar thermal, and carbon capture technologies. We look forward to working with the CARB on finding economically sustainable solutions moving forward.

Sincerely,

Michael Boccadoro, Executive Director
Agricultural Energy Consumers Assoc

Bill Mattos, President
California Poultry Federation

Lance Hastings, President
California Manufacturers & Technology Assoc

Roger Isom, President/CEO
California Cotton Ginners and Growers Assoc
Western Agricultural Processors Assoc

Rob Neenan, President/CEO
California League of Food Producers

Robert Spiegel
California Farm Bureau Federation