

Liane M. Randolph
Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on CARB's Draft 2022 Climate Change Scoping Plan

Dear Chair Randolph:

On behalf of DTE Vantage, we appreciate the opportunity to comment on the Draft 2022 Scoping Plan (Scoping Plan) issued on May 10th. DTE is a developer, owner, and operator of biomass, co-generation and landfill gas electricity facilities in California; supplies renewable natural gas (RNG) to the state through the Low Carbon Fuel Standard (LCFS); and is currently in the process of developing one of the first carbon capture and sequestration (CCS) facilities in California.

DTE is deeply invested in California's goals for carbon neutrality, and CARB's Scoping Plan is a good first step in balancing climate and health benefits with cost-effectiveness and technological feasibility. It will lead to significant health benefits in disadvantaged communities, create new economic opportunities, and ensure the state continues to lead on innovative strategies to tackle climate change. It also clearly recognizes California cannot reach its goals without using critical technologies such as CCS, RNG and biomass utilization, which are needed to decarbonize the state's transportation and electric sectors.

DTE agrees with CARB's conclusion in all four Scoping Plan scenarios that CCS is a necessary tool for reducing emissions. For the Final Scoping Plan, DTE recommends CARB expand the use of CCS to all industrial sectors instead of just in the oil and gas sector. The science regarding CCS is well established and supported by multiple credible and independent expert analyses. These technologies do not necessarily increase local air pollution, and in fact, can reduce such pollution, and should be evaluated on their general merits as well as on an individual project basis. Moreover, CCS can foster workforce maintenance and a more equitable transition during the shift to a clean energy economy while easing the burden on the most vulnerable ratepayers.

The Scoping Plan rightfully supports innovative programs that eliminate short lived climate pollutants in the dairy and biomass sectors, which are needed to reduce greenhouse gas (GHG) emissions. DTE agrees with CARB that a key strategy for reducing methane is "to install state of the art anaerobic digesters that maximize air and water quality protection, maximize biomethane capture, and direct biomethane to sectors that are hard to decarbonize or as a



feedstock for energy.”¹ Anaerobic digesters and related technologies are critical to achieving the state’s goals and are also required by Senate Bill 1383 (SB 1383) (Lara, 2016) and other state statutes. In fact, the 2017 California Energy Commission Integrated Energy Policy Report reached similar conclusions in recommending biomethane be used more extensively in California. Moreover, we support CARB’s proposed strategy to initiate a public process focused on options to increase the stringency and scope of the LCFS, as we believe such an action is necessary to send appropriate market signals and encourage continued investment in these necessary fuels.

DTE thanks CARB staff for their continued work in developing thoughtful analysis for the Scoping Plan. Please reach out to me if you have any questions or concerns about these comments.

Sincerely,

A handwritten signature in black ink that reads "Mark H. Rigby". The signature is written in a cursive, flowing style.

Mark H. Rigby
Vice President
DTE Energy Services, Inc.

¹ Draft 2022 Scoping Plan Update, May 10, 2022; p.187.