



August 27, 2024

VIA ELECTRONIC FILING

Matthew Botill  
California Air Resources Board  
1001 I Street  
Sacramento, California 95814

**Re: SJI Renewable Energy Venture's Comments on the Low Carbon Fuel Standard (LCFS)  
15-Day Amendments**

Dear Mr. Botill:

SJI Renewable Energy Ventures focuses on clean energy development and decarbonization via renewable energy production and energy management activities. Through these activities, we are committed to the nation's transition to a carbon-free economy and, accordingly, has developed a comprehensive clean energy plan that includes being a leader in the development of dairy digester projects in the United States. SJI works closely with the Environmental Protection Agency (EPA), California Air Resources Board (CARB), local dairy farmers, utilities, and surrounding communities to directly reduce greenhouse gas (GHG) emissions.

SJI Renewable Energy Ventures thanks CARB for the opportunity to take part in the many workshops and conversations during the development of the Proposed Amendments (Proposed Rule) and the Initial Statement of Reasons (ISOR). We respectfully submit the following comments on the 15-Day Amendments. Through the enhancement of the program's goals, CARB will be best suited to address GHG reductions from transportation fuels. The following comments will focus on increased program ambition and deliverability.

**Increased Program Ambition**

SJI Renewable Energy Ventures appreciates CARB's change from 5% to a more aggressive 9% stepdown in the 15-day package. This should move should help alleviate the current over supply in the credit bank. As mentioned in previous comments, stronger CI reduction targets is an essential element to driving down GHG emissions. Given the current LCFS credit surplus, seen over the last few years, we respectfully suggest an even larger step-down in the carbon intensity benchmark. This is critical to signal market support and increase investments. Additionally, we respectfully recommend that CARB target at least a 35% CI reduction by 2030 and allow for the Auto Acceleration Mechanism (AAM) to be triggered based on 2025 data.

**Deliverability Requirements**

Book-and-Claim has allowed the LCFS to become one of the most successful decarbonization programs in the country. California has benefitted from the use of indirect accounting through national investments and participation in the LCFS. In return, the program has been highly successful at reducing GHGs, a goal we all support. SJI Renewable Energy Ventures respectfully requests CARB hold a separate process to address deliverability as it pertains to gas maps and the adoption of the California Renewable Portfolio Standard (RPS) language. Greater stakeholder engagement on the specific topic will produce the best possible policy.

**Conclusion**

SJI Renewable Energy Ventures appreciates the opportunity for continued participation throughout this rulemaking process. We remain committed to providing RNG to the California LCFS market and helping to reduce methane emissions, improve animal manure management in agricultural communities, and decarbonize California's transportation sector. We thank CARB for your continued work toward this end and look forward to any possible updates prior to November.

Sincerely,

*Kyle Nolan*

Kyle Nolan  
Chief Operating Officer  
SJI Renewable Energy Ventures