

April 16th, 2025



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 third 15-day proposed changes to the CA Low Carbon Fuel Standard (LCFS). Promus appreciates the pace at which CARB has proposed the LCFS rule revisions to satisfy the California Office of Administrative Law (OAL).

Promus agrees with the changes proposed by CARB and urges a rapid resubmission to OAL to finally implement the new LCFS rules. 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% average CI reduction by 2045. Repeated delays and market uncertainties have undermined financing and development of the lowest carbon fuels. Promus appreciates CARB's understanding of this and efforts to implement the new regulations as soon as possible.

Sincerely,

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