

VESPENE ENERGY

1331 7th Street Suite F
Berkeley CA 94705

Dear California Air Resources Board,

I am writing on behalf of Vespene Energy, a biogas developer who converts biomethane from dairy digesters into renewable electricity. Our projects provide significant environmental and community benefits by reducing CO₂ and other pollutants while generating clean, reliable power. As part of our commitment to sustainability, we urge CARB to include linear generators alongside fuel cells in the proposed language on non-combustion technologies.

Linear generators, like those from Mainspring, meet California's strictest air emissions standards, with data proving their emissions profiles match or exceed those of fuel cells. By only including 'fuel cells,' the current language limits available technology options and slows innovation in non-combustion energy solutions.

Linear generators are highly effective when paired with renewable natural gas (RNG) to power electric vehicles via book-and-claim mechanisms. Their clean emissions, dispatchability, and full turn-down capability make them ideal for projects like those we develop with California dairies.

A simple fix would be to replace 'fuel cells' with 'fuel cells or linear generators' in the regulation. This change would ensure fairness, foster technological diversity, and support California's goals of reducing carbon emissions and promoting clean energy

Thank you for considering this important update, which will allow us and others in the industry to make the best decisions for California's clean energy future.

Sincerely,



Adam Wright

CEO