May 31, 2019

John Wassam
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

RE: Comments on Changes to Renewable Energy Portfolio Standard Class I and Class II Regulations

Dear Mr. Wassam:

I. Introduction

The Coalition for Renewable Natural Gas (RNG Coalition) is a nonprofit organization representing and providing public policy advocacy and education for the Renewable Natural Gas (RNG or biogas-derived biomethane) industry. The RNG Coalition advocates for the increased development, deployment and utilization of RNG, and availability of domestic, renewable, clean fuel and energy in Massachusetts and across North America.

We respectfully submit these comments in response April 5, 2019 draft regulations to amend portions of Title 225 Code of Massachusetts Regulations (CMR) 14 (Renewable Energy Portfolio Standard – Class I) and 225 CMR 15 (Renewable Energy Portfolio Standard – Class II) put forward by the Department of Energy Resources (DOER).

II. We Support the Updated Definition of "Eligible Biogas Fuel" and "Renewable Natural Gas" as a Subset of "Eligible Biomass Fuel"

We support the updated definition in both Section 14.02 and 15.02 of Title 225 CMR clarifying that biogas is a unique subset of biomass fuel with different properties than that of solid biomass. We also appreciate that this new definition explicitly includes the term RNG, in recognition of the fact that biogas can be upgraded to meet pipeline specifications and serve as a "drop-in" substitute in any application that would otherwise rely on geologic natural gas.

III. The Majority of Commercial Renewable Natural Gas Projects use Feedstocks Derived from Waste Biomass Streams and Often Reduce Methane.

Clearly differentiating between RNG and all other forms of biomass fuel is important due to the differences in performance across both lifecycle greenhouse gas (GHG) emission performance and with respect to emissions performance upon combustion.[1]

RNG is produced from organic waste products found in landfills, water treatment plants, farms, dairies and more. When these organic wastes decompose, they emit methane-rich biogas. Prior to the RNG project, that biogas may be released—emitting a potent GHGs into the Earth's atmosphere. Converting this biogas into RNG avoids the release of methane and also displaces the use of a fossil fuel.[2] As a result, RNG projects from these feedstocks have the best lifecycle GHG performance of any fuel as measured in California's Low Carbon Fuel Standard.[3]

In summary, the RNG resource is underdeveloped and in need of additional policy support from programs such as Massachusetts' Renewable Energy Portfolio Standard. The definitions in the proposed amendments create clarity for project developers and will help facilitate continued build out of RNG projects.

Sincerely,

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[1] Because RNG has been upgraded to meet pipeline quality specifications, local air emissions associated with combustion of RNG is analogous to that of geologic gas.

[2] *The Production and Use of Waste-Derived Renewable Natural Gas as a Climate Strategy in the United States* Rebecca Gasper and Tim Searchinger, World Resources Institute Working Paper, April 2018. Available here: https://wriorg.s3.amazonaws.com/s3fs-public/production-use-renewable-natural-gas-climate-strategy-united-states.pdf?_ga=2.135870067.37736265.1559236521-1533066591.1559236521

[3] *LCFS Pathway Certified Carbon Intensities.* California Air Resources Board. Accessed May 2019 from: https://www.arb.ca.gov/fuels/lcfs/fuelpathways/pathwaytable.htm