



UNITED STATES
HOUSE OF REPRESENTATIVES

COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEE ON AGRICULTURE, RURAL
DEVELOPMENT, FOOD AND DRUG
ADMINISTRATION

SUBCOMMITTEE ON MILITARY CONSTRUCTION,
VETERANS' AFFAIRS AND RELATED AGENCIES

SUBCOMMITTEE ON TRANSPORTATION, HOUSING,
AND URBAN DEVELOPMENT, AND RELATED
AGENCIES

COMMITTEE ON BUDGET

May 26, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue
Washington, DC 20460

Re: Proposed Changes to the Renewable Fuel Standard (RFS) Program

Administrator Regan,

We are writing to share our concerns about the U.S. EPA's proposed changes for the Renewable Fuel Standard (RFS) Program. We appreciate the Administration's efforts to promote the use of fuels made from agricultural byproducts, including renewable natural gas. However, we're worried that the proposed rule, if carried out, could negatively affect the investments and successes achieved through the program's inclusion of renewable natural gas. These changes could also discourage dairies and other producers from investing in methane capture infrastructure and disrupt existing renewable natural gas markets.

Our main concern lies with the proposed Renewable Identification Number (RIN) provisions, specifically the suggested alterations to the credits provided for electric vehicle manufacturers and the significant regulatory changes related to renewable natural gas pathways. We believe that the program should treat different fuels equally in terms of renewable natural gas usage. Our understanding is that the Administration's proposed rule would favor certain uses of renewable natural gas over others. To continue to incentivize the usage and development of renewable natural gas and decarbonize the transportation sector, it is important ensure that renewable natural gas is given an even playing field to implement its usage to the fullest extent possible.

As we understand it, the proposed changes would significantly impact the treatment of Electronic Renewable Identification Numbers (eRINs), providing credits that could encourage a shift from compressed natural gas (CNG) and liquefied natural gas (LNG) use to eRINs. These changes could disrupt the growing market for renewable natural gas generated by dairies and other producers. Existing contracts for securing renewable natural gas for transportation could become less valuable to purchasers or producers, and in some cases, could become obsolete. Moreover, investments in current infrastructure could be jeopardized, and federal programs, including loan guarantees, might not see a return on investment.

Furthermore, incentivizing a move away from renewable natural gas use in transportation would negatively impact efforts to reduce emissions from heavy trucks. Currently, there is a lack of commercially available heavy electric trucks, and it's unlikely that they will be widely accessible in

the immediate future. Fleets of heavy-duty trucks that run on renewable natural gas are already on the market and are an extremely effective tool in reducing emissions. Utilizing these trucks helps to avoid the rapid imposition of high costs on owners and operators, avoids rapid disruption and uncertainty in the industry, and offers an easily accessible transitional fuel option within freight transport. The proposed changes would discourage the use of renewable natural gas in transportation, undermining emission reduction achievements that rely on existing and accessible technology. We strongly urge your Administration not to proceed with the proposed changes regarding eRINs in the RFS Program until this issue is addressed in a way that restores RINs to their previous value.

Sincerely,



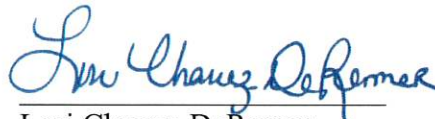
David G. Valadao
Member of Congress



Jim Costa
Member of Congress




Cliff Bentz
Member of Congress



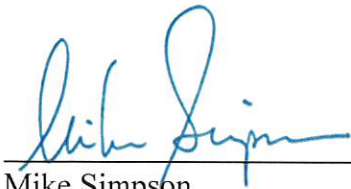
Lori Chavez-DeRemer
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Chris Stewart
Member of Congress



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Mike Simpson
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