



May 4, 2023

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

Dear Administrator Regan,

We are writing to reaffirm our strong support for the inclusion of renewable electricity in the Renewable Fuel Standard (RFS) and to urge the EPA to follow through on the creation of a national eRINs program as part of the final SET Rule that is currently under consideration. The RFS Power Coalition's members are stakeholders across a broad spectrum of renewable energy sources, including biogas and biomass power, and many affiliated organizations along those supply chains. We convert material that would otherwise sit, biodegrade, and emit carbon dioxide and methane into the atmosphere into clean renewable energy, including electricity.

As such, since the establishment of the RFS in 2007, we have eagerly anticipated the creation of an electric pathway that would allow producers of renewable electricity to generate tradeable credits for powering electric vehicles. And although the SET Rule proposal that was released in December 2022 is more favorable to some of our members than others, we nonetheless recognize it as a tremendous step forward that can still be expanded in coming years to include all renewable feedstocks.

It is no surprise that as the release of the final SET Rule becomes imminent, media speculation about the eRINs program is on the rise. We were disappointed to see an article from Reuters this week that speculated about a potential eRINs delay. Though we are not privy to the deliberations taking place at EPA, we firmly believe that it is critical that a national eRINs program launches as soon as possible. With states setting optimistic benchmarks for future EV adoption and President Biden's own goal of 50% of new car sales being electric by 2030, the demand for renewable electricity to power those EVs is on the rise. The eRINs program incentivizes the necessary growth among renewable electricity providers to meet a level of demand that will rapidly increase in the coming years.

We do not believe this to be the time to allow the pursuit of a perfect regulatory policy structure to get in the way of a very good and necessary program. So while our members would like to see all feedstocks eligible for inclusion in the eRINs program; for the RVOs contained in the SET Rule to be significantly increased to reflect projected usage in a post-pandemic America; and for other important changes to be made – we believe all of those valid criticisms should not delay the prompt commencement of a domestic eRINs program.

Thank you for your attention to this letter. If the RFS Power Coalition can be useful in any way, please do not hesitate to let us know.

Sincerely,

A handwritten signature in black ink that reads "Patrick Serfass".

Patrick Serfass  
American Biogas Council

A handwritten signature in black ink that reads "Carrie Annand".

Carrie Annand  
Biomass Power Association