



November 20, 2023
The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Broad Support for Electric Pathways in the Renewable Fuel Standard Program

Dear Administrator Regan:

On behalf of the newly formed Partnership for Electric Pathways (PEP), the undersigned companies and organizations are writing to urge the finalization of the eRINs regulation proposed by the U.S. Environmental Protection Agency (EPA) in December 2022, as part of the Renewable Fuel Standard (RFS) Program “Set” Rule¹. Finalizing these regulations will achieve and accelerate the goals of the RFS by expanding America’s renewable fuels through proven technology to convert otherwise-wasted methane into electric transportation fuel.

We steadfastly support EPA’s most recent proposal to effectuate the Agency’s 2010 and 2014 regulations to allow for electricity derived from eligible biomass resources to qualify as RFS renewable fuel. Our consortium includes a range of entities involved in producing and using electricity to power electric vehicles—throughout the value chain. This coalition also includes existing RIN generators and RFS compliance entities. We share the common goals of reducing emissions, capturing waste, and decarbonizing transportation while growing the American workforce.

We envision eRINs as a complementary policy to the Administration’s clean air commitments and methane abatement goals that would fulfill the statutory authorities and aims of the RFS. This would result in new and geographically diverse low-carbon fuels for a growing light-duty electric fleet. The eRIN program would not require new federal funding. eRINs would also help renew local and ancillary infrastructure for municipal solid waste facilities and wastewater treatment systems by proactively harnessing organic waste streams for the generation of clean power. Through eRINs, these investments can be readily deployed through commercial arrangements which have been in development based on EPA’s proposal last year.

eRINs simultaneously advance U.S. commitments to reducing pollution and greenhouse gas emissions through the Global Methane Pledge, a voluntary and timely effort to reduce methane emissions by 2030. The program will enable landfill operators to capture greater amounts of methane emissions that otherwise would be emitted into the atmosphere—both by incentivizing

¹ 87 FR 80582

investment in landfill gas-to-electricity infrastructure at smaller landfills and replacing aging infrastructure nearing the end of its useful life. By incentivizing the next generation of methane abatement strategies, the eRINs program would provide numerous environmental benefits such as improving air quality, health outcomes, and odor control in local communities across America.

The proposed eRINs regulations would also improve energy security by increasing and diversifying domestic fuel options. They would benefit rural economies, providing an additional income stream by capturing and putting existing farm operations' waste methane emissions to work, creating financial security for farmers, and bringing skilled jobs to rural America in conjunction with the electrification of America's transportation sector.

Electrifying the light-duty fleet is a pillar of the Biden Administration's domestic climate policy goals and is a top focus of current EPA rulemakings to address vehicle tailpipe emissions and fuel economy standards. eRINs are a valuable adjacent framework to help accomplish the ambition of these goals across multiple sectors.

For these reasons, we respectfully urge the EPA to approve, as soon as possible, the programmatic provisions for electricity RINs as proposed by the Agency. Thank you for your leadership on this important initiative.

Respectfully,



Alliance for Automotive Innovation
Ameresco
American Biogas Council
American Honda Motor
Anew Climate
Audi of America
Biomass Power Association
bp
Bridge to Renewables
Coalition for Renewable Natural Gas
DTE Vantage
EDL Energy
Electric Drive Transportation Association
Ford Motor Company
General Motors
Kia Corporation
Lucid Motors

Mitsubishi Motors North America, Inc.
National Milk Producers Federation
NextEra Renewable Fuels
Nissan North America
OPAL Fuels
RFS Power Coalition
Rivian
Toyota Motor North America
Volkswagen Group of America
Volvo Car USA
WM

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