



Intro to RNG Markets for GHG Reduction Claims

September 20, 2023 Ashley Player, PE Partner, Energy Compliance Services At Weaver, there are no "one-size-fits-all" solutions. We combine leading technical knowledge with specific industry experience to provide highly customized services tailored to each client's needs.

Industries

- Renewable energy
- Oil and gas
- Oilfield services
- Real estate
- Technology
- Manufacturing and distribution
- Professional services
- Financial services
- Financial institutions
- Private equity
- Insurance
- Healthcare
- Construction
- Hospitality
- Government
- Not-for-profit
- ► Higher education

Services

Advisory Services

- Energy Compliance Services
- Client advisory services
- Risk advisory services
- IT advisory services
- Transaction advisory services
- Forensic and litigation services

Assurance Services

- Audit, review and compilation
- Agreed-upon procedures
- Employee benefit plan audit
- SOC reporting
- Attestation services
- ▶ IFRS assessment and conversion

Tax Services

- Federal tax
- State and local tax
- International tax
- Private client services



55

Top 35 Firm nationwide



Best of the Best Firms (2022)

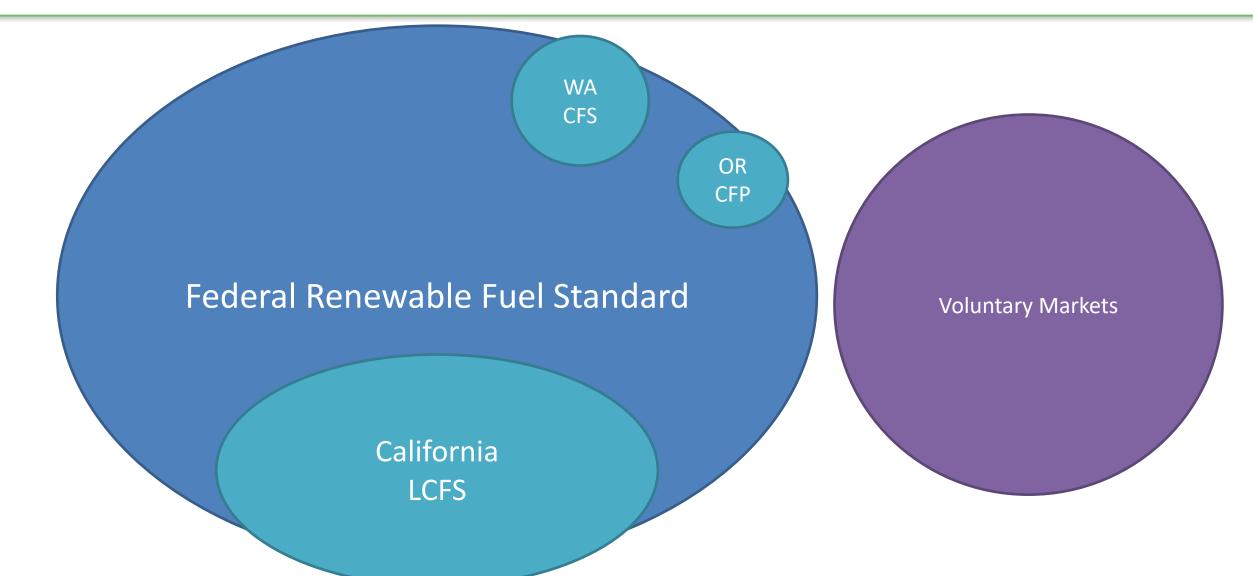
Inside Public Accounting





Domestic RNG Markets







RFS D Code Categories



Cellulosic Biofuel:

- D codes **3**, **7**
- At least 60% reduction

Biomass-Based Diesel:

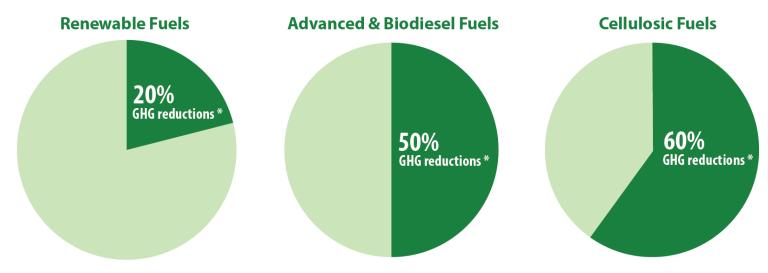
- D codes **4**, **7**
- At least 50% reduction

Advanced Biofuel:

- D code **5 (or 3, 4, 7)**
- At least 50% reduction

Lifecycle Greenhouse Gas (GHG) Emissions

GHG emissions must take into account direct and significant indirect emissions, including land use change.



^{*} compared to a 2005 petroleum baseline

Total Renewable Fuel:

- D code 6
- At least **20**% GHG reduction; except:
- Existing (2007) facilities are "grandfathered", i.e., exempt to its 2007 baseline

RFS Biogas Basics



- Anaerobic Digestion of Organic Matter (D3)
 - Landfills
 - Municipal Wastewater
 Treatment Plants
 - Agricultural Digesters
 - Separated MSW Digesters
- Other Digestion (D5)
 - Other Renewable Biomass
 Waste Digesters

- Renewable Fuel Valid Uses
 - CNG Sold/Used as Transportation Fuel
 - LNG Sold/Used as Transportation Fuel



RFS: No Double-Counting



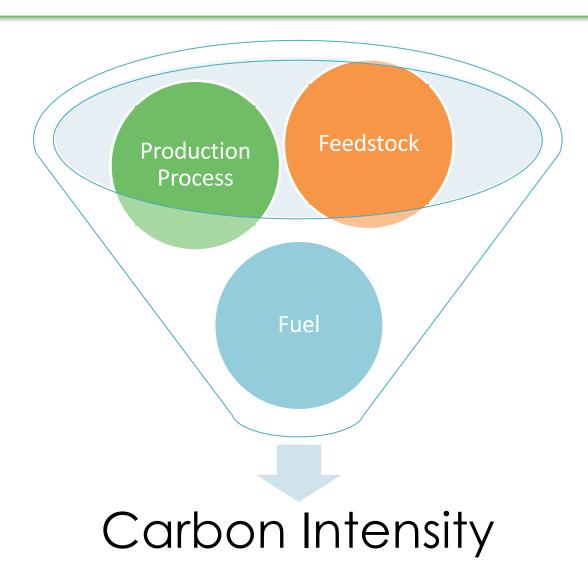
When any party becomes aware of any of the following, they must notify EPA and the RIN generator, if known, within 5 business days of initial discovery:

- » More than one RIN being generated for renewable fuel produced from the same volume of biogas, treated biogas, or RNG
- » More than one RIN being generated for the same volume of biogas-derived renewable fuel or RNG
- » A party taking credit for biogas, treated biogas, or RNG under a non-transportation program (e.g., a stationary-source renewable electricity program) and also generating RINs for renewable fuel produced from that same volume of biogas, treated biogas, or RNG
- » A party taking credit for biogas-derived renewable fuel or RNG under a non-transportation program (e.g., a stationary-source renewable electricity program) and also generating RINs for that same volume of biogas-derived renewable fuel or RNG
- » A party taking credit for biogas, treated biogas, or RNG used outside the covered location and also generating RINs for renewable fuel produced from that same volume of biogas, treated biogas, or RNG
- » A party taking credit for biogas-derived renewable fuel or RNG used outside the covered location and also generating RINs for that same volume of biogas-derived renewable fuel or RNG.



LCFS Carbon Intensity (CI)





- CA-GREET 3.0 Model
 - Feedstock
 - Production Process
 - Fuel
- Simplified Tier 1 Calculators
 - Landfills
 - Wastewater Sludge
 - Organic Waste
 - Dairy and Swine Manure

CA-GREET 3.0 Calculator





Summary of the Tier 1 Landfill Biomethane Pathway Release Date: August 13, 2018

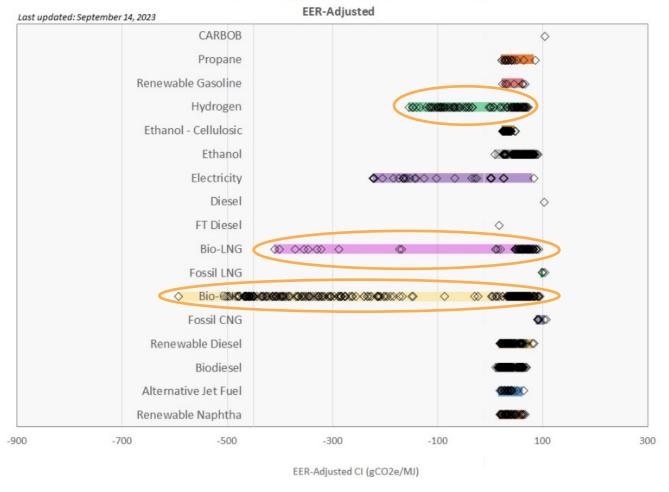
Pathway Descriptions and Results			
Finished Fuels	Carbon Intensity from Inputs (gCO₂e/MJ)	Conservative Margin of Safety (gCO2e/MJ)	Total Carbon Intensity (gCO2e/MJ)
Compressed Natural Gas (CNG)	0.00	0.00	0.00
Fuel Producer: . landfill gas to pipeline-quality biomethane; delivered via pipeline; compressed to CNG in California.			
Liquefied Natural Gas (LNG)	0.00	0.00	0.00
Fuel Producer: . landfill gas to pipeline-quality biomethane; delivered via pipeline; liquefied to LNG at; transported by trucks to California.			
Liquefied CNG (or L-CNG)	0.00	0.00	0.00
Fuel Producer: . landfill gas to pipeline-quality biomethane; delivered via	pipeline; liquefied to L	NG at ; re-gassified in Califo	rnia.

- Operational CI < Certified CI
 - May keep Certified CI or request to Update CI
- Operational CI > Certified CI
 - Out of Compliance
 - Subject to Investigation and Enforcement
 - Credits Adjusted Retroactively

LCFS Fuel Pathway CI



Carbon Intensity Values of Certified Pathways



Biogas Pathways (CNG)

- Landfill Gas (40)
- WWTP (30)
- Organics (-10)
- Manure Digester (-300)

Hydrogen

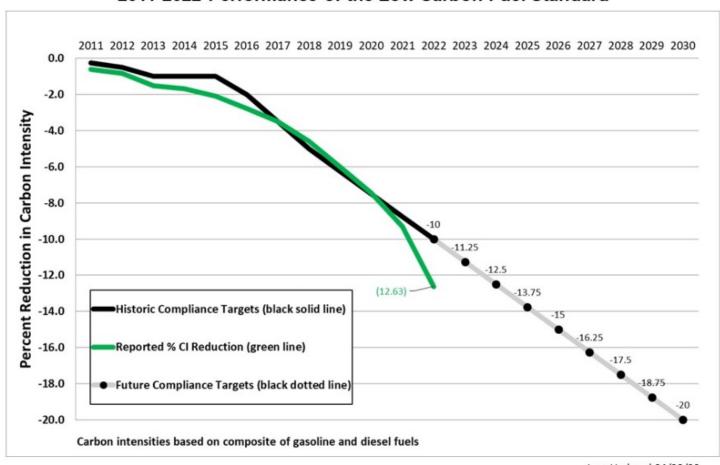
- Grid Electricity (160)
- Zero Cl Electricity (10)
- Landfill Gas (105)
- WWTP (130)
- Manure Digester (-240)

https://www.arb.ca.gov/fuels/lcfs/fuelpathways/pathwaytable.htm

LCFS Fuel Pathway CI



2011-2022 Performance of the Low Carbon Fuel Standard



Average CI Reduction

- 20% by 2030
- 11.25% for 2023

Future Uncertainty

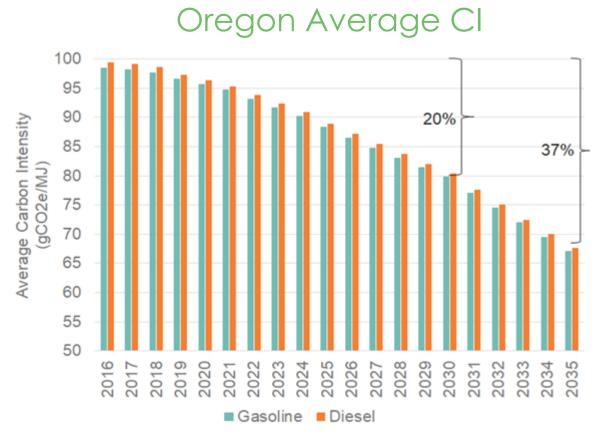
- Multiple Options
- Area Under the Curve
- Automatic Ratcheting

Last Updated 04/28/23

Oregon Clean Fuels Program



- Closely Follows California
 - Cl Approved by CARB
 - Slight Modifications for OR-GREET
 - Credits and Deficits
 - Annual Verification
- RNG is Voluntary
 - CNG and LNG are opt-in
 - RNG is opt-in



https://www.oregon.gov/deg/ghgp/cfp/Pages/CFP-Overview.aspx

Washington Clean Fuel Standard



Participation Fee

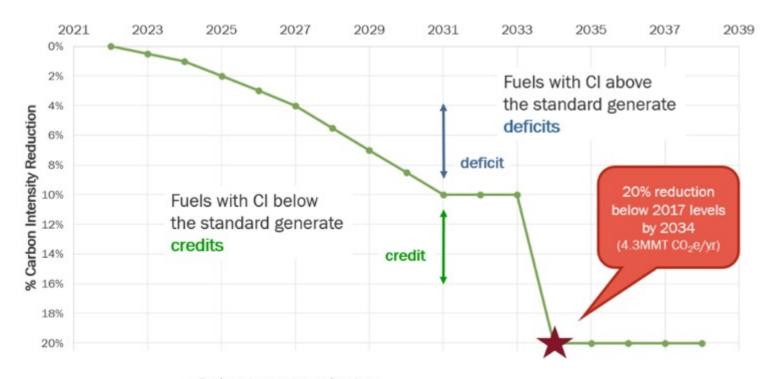
- 2023 fee
- Deficit (95%): \$50,649
- Credit (5%): \$982

Fuels Obligated

- CNG and LNG are obligated
- RNG is opt-in

Follows CARB

- CI Approved by CARB
- Slight Mods for WA-GREET model



Carbon intensity reduction

https://ecology.wa.gov/air-climate/reducing-greenhouse-gas-emissions/clean-fuel-standard



M-RETS Renewable Thermal Tracking weaver

- Tracking System
 - Registers Environmental Attributes
 - Web-based system
- Renewable Thermal
 - Biogas
 - RNG
 - Blue/Green Hydrogen
 - Other (heat pumps, solar thermal, etc.)
- Independent Reporting Entity
 - Confirms data reported for RTC generation
- Supports CI Pathway Reporting
 - GREET, GHGenius, CA-GREET 3.0, etc.

Dekatherm (Dth) Renewable Thermal = 1 Renewable Thermal Certificate

Certificate Details include:

- Serial Number (See Example)
- Account
- Project
- Thermal Resource
- Feedstock
- Vintage
- Location
- Quantity

Carbon Pathways (If Applicable)
IRE Verification (If Applicable)

https://www.mrets.org/m-rets-renewable-thermal-tracking-system/

Green-e® Renewable Fuel Standard



The Green-e® Standard Addresses



Intended to support marketing claims regarding biomethane use

CI Models Accepted

- CA-GREET 3.0
- GHGenius

Certification Now and in the Future



The Standard currently allows certification of fuels products comprised of biomethane from landfill gas or the anaerobic digestion of certain organic waste material.



In the future, CRS will consider expansion of the program to address other products, such as solar thermal, geothermal, and green hydrogen.

Voluntary Market Customers



Corporate Carbon Accounting

- Currently not mandated to disclose
- SEC proposed a rule which would require disclosure of Scope 1, 2, and 3
 GHG emission data

Utilities

- Customer opt-in programs
- State natural gas utility mandates (not voluntary)
- Careful of double-counting concerns

GHG Protocol Accounting Standards

- Update Uncertainty
- RNG for Scope 1: Claim zero? Able to go negative based on CI score?



Questions?

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