



Z E T A



Bridge to
Renewables



May 5, 2023

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

**RE: Broad Support for Inclusion of eRINs in the Renewable Fuel Standard (RFS)
Program: Standards for 2023–2025 and Other Changes**

Dear Administrator Regan:

On behalf of the undersigned automakers, biogas producers, and stakeholder organizations, we write to express our collective and robust support for eRINs in the Renewable Fuel Standard (RFS) program. We urge the U.S. Environmental Protection Agency to include eRINs in the upcoming final rulemaking for RFS 2023-2025 Standards and Other Changes.

We commend EPA's actions to implement eRINs beginning in 2024, and we strongly encourage the Biden Administration to finalize a framework in June 2023. Recent press reports indicate EPA may exclude or separate eRINs from this important RFS rulemaking, and we urge the EPA to not falter in finalizing this important framework.

Congress and EPA have clearly established a role for electricity in the Renewable Fuel Standard, and EPA's eRINs proposal should not be further delayed or abandoned. EPA approved the biogas electricity pathway in 2014, and Congress has expressed ongoing support for its implementation. The House and Senate Appropriations Committees, for example, have directed EPA to process electricity applications in annual reports dating back to 2018.

EPA has long recognized the many environmental and economic benefits associated with eRINs, including critical reductions in greenhouse gas emissions. This long-awaited opportunity is timelier than ever. eRINs are complementary to other federal policies that encourage the production of renewable fuels and eRINs will directly support the electrification of the U.S. vehicle fleet. Collectively, we believe eRINs will support a broad market transformation of the electric vehicle and biogas power sectors.

In support of the foregoing, we urge EPA to continue its good work in bringing eRINs to fruition, and we encourage the Agency to stay the course and implement eRINs in the final rule in June 2023.

Sincerely,

Alliance for Automotive Innovation
American Biogas Council
Bridge to Renewables
National Association of Clean Water Agencies
National Milk Producers Federation
The Business Council for Sustainable Energy
The Coalition for Renewable Natural Gas
Zero Emission Transportation Association