

Nature Energy plans to invest \$2-3B dollars to build up to 20 renewable natural gas (RNG) projects in NYS over the next 10 years. We collect organic waste from dairy farmers, food producers, and municipalities - producing RNG and returning the nutrients to agriculture for crop production. Nature Energy owns and operates 14 biogas plants located throughout Denmark and is the world's largest producer of biogas-based RNG. Nature Energy's current biogas plants will treat more than 4.4 million tonnes of biomass waste from agriculture, industry and households in 2023, converting it into more than 181 million m³ of RNG - enough to fuel 8,000 busses driving 30,000 miles per year, or to heat 157,000 homes. All of this is CO₂ neutral as well as replacing fossil fuels.

Nature Energy supports the passage of a clean fuel standard as it would:

- Incentivize the production of RNG as an alternative to petroleum based transport fuels,
- Help to meet NY's climate, renewable energy and waste diversion goals through anaerobically digesting organic waste streams,
- Provide dairy farmers a diversified revenue stream and protect their right to operate in a changing environment,
- Diversify fertilizer production away from fossil fuels by supplying nutrients from animal manure and other organic feedstocks,
- Allow for rural economic development in upstate NY by building out anaerobic digester infrastructure.

Aggressive electrification is not in conflict with strategic use of low carbon fuels, and in fact the scoping plan makes clear that the largest possible emissions reductions can be obtained by pairing aggressive electrification with strategic use of low carbon fuels. Absent a very significant and unlikely shift in federal policy, vehicles that were built to run on fossil diesel and gasoline will continue to be sold in NYS until 2045 and will continue to be on the road for years afterward, past the 2050 date by which the CLCPA requires economy-wide carbon neutrality. A CFS is the only realistic tool the State has to decarbonize liquid fuels in the medium term. As the scoping plan makes clear, implementing a CFS for on-road transportation now is crucial to the market development for clean fuels for off-road and hard-to-electrify transportation in the later years of the plan. If New York moves forward with a cap-and-invest program in this year's budget, a CFS can be a strong complement to that program, improving the effectiveness of both policies. While a cap-and-invest program would reduce greenhouse gas emissions economy-wide, it would not directly stimulate the market for cleaner transportation fuels the way that a CFS would.

Nature Energy looks forward to working alongside NYS stakeholders to meet the state's world leading climate goals.