



Finding a Better Way

October 19, 2023

The Honorable Gary Gensler, Chair  
The Honorable Hester M. Peirce  
The Honorable Caroline A. Crenshaw  
The Honorable Mark T. Uyeda  
The Honorable Jaime Lizárraga  
VIA Email Submission to [rule-comments@sec.gov](mailto:rule-comments@sec.gov)

Re: Proposed Climate-Related Disclosures for Investors (File No: S7-10-22)

Dear Chair and Commissioners:

I am writing to respectfully request that the final version of above-referenced Securities and Exchange Commission (SEC) rule clearly state that the Department of Energy's Argonne National Labs GREET model is an acceptable tool for modeling and reporting supplier-specific emissions factors, and that market-based methods are acceptable for use in reporting upstream emissions for purchased renewable natural gas (RNG).

U.S. Energy is a vertically integrated energy solutions provider. We help our customers address their specific transportation and thermal energy needs along the entire continuum from traditional and renewable fuels to electrification. We are part of the innovative and entrepreneurial U.S. Venture family of companies, working for more than 70 years to find a better way in all that we do.

U.S. Energy was an early entrant into the RNG production and supply market because we recognized the fuel's remarkable emissions reduction benefits. RNG is produced by capturing and processing methane created when organic waste decomposes. Methane is a powerful greenhouse gas (GHG) that is 84 times more harmful than CO<sub>2</sub>. RNG from dairy waste is carbon negative because it is produced from methane that would otherwise be emitted directly into the atmosphere.

Today, we are partners in more than 40 RNG projects and manage a dispensing network of more than 190 renewable/compressed natural gas fueling stations. Through the first quarter of 2023, our projects generated over 159 million cellulosic renewable identification numbers (D3/cellulosic RINs) under the Environmental Protection Agency's national Renewable Fuel Standard. U.S. Energy also delivers a large and growing quantity of RNG to various voluntary buyers including utilities, transportation authorities and corporations that are all looking to decarbonize their operations.

Against this backdrop, we reiterate the technical policy analysis and recommendations submitted by the Coalition for Renewable Natural Gas. We urge the SEC to take this opportunity to clearly and directly state that crucial current market practices – specifically, utilizing the federal government's own GREET emissions model and the book-and-claim accounting methodology – may remain essential elements of capturing the emissions reduction benefits of RNG. The absence of this regulatory clarity could discourage investment in the very methane capture developments that are essential for meeting GHG reduction goals.

Sincerely,

Mike Koel  
President, U.S. Energy