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*Comment Received From: Coalition for Renewable Natural Gas  
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Docket Number: 25-OIR-02*

**RNG COALITION Comments on Energy Data Collection “ Phase 3  
for Natural Gas and Renewable Natural Gas Data Collection**

Please see our attached comments.

*Additional submitted attachment is included below.*



VIA ELECTRONIC FILING

February 3, 2026

California Energy Commission  
715 P Street  
Sacramento, California 95814

**Re: Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection in the California Code of Regulations**

The Coalition for Renewable Natural Gas (RNG Coalition) is a California-based nonprofit organization representing and providing public policy advocacy and education for the Renewable Natural Gas (RNG) industry.<sup>1</sup> RNG Coalition respectfully submits these comments to the California Energy Commission (CEC) in response to the *Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection in the California Code of Regulations (Draft Rule)*.

We support robust reporting and data collection for RNG activities in California. The Draft Rule is a good first step to develop a CEC data collection framework that demonstrates and tracks RNG’s unique contribution to California’s clean energy goals. The CEC has long recognized the importance of RNG as a key decarbonization strategy—both to promote methane reduction from organic waste streams and as a source of green molecules to displace conventional fuels. Accurate data collection will be critical as the role of RNG increases in California’s gas system.

**Reporting Threshold is Relatively High**

Depending on what the CEC wishes to accomplish with the RNG plant dataset, the reporting threshold of at least one billion British Thermal Units of annual production capacity may be relatively high (e.g., capture only the largest RNG projects). As a point of comparison, we recommend CEC staff review the capacity ratings of existing projects as captured in the Renewable Natural Gas Database developed by researchers at Argonne National Labs.<sup>2</sup>

**The Relationship Between Waste Feedstock Input and Gas Generation is Not Always Straightforward**

Anaerobic Digestion (AD) is a complex biological process, the feedstocks input into AD units are not homogeneous, and operating conditions can significantly impact gas yield per unit mass of feedstock. Therefore, reporting the “amount of feedstock used to produce the RNG” as required in

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<sup>1</sup> For more information see: <http://www.rngcoalition.com/>

<sup>2</sup> <https://www.anl.gov/esia/reference/renewable-natural-gas-database>



§1384.5(b)(3) may not be easy to determine, in a consistent way, across all reporting parties without more specificity.

We recommend additional work be done to determine appropriate measurements for each RNG feedstock category, perhaps with an initial focus on monthly “intake of waste” for landfill and food waste projects and “manure processed” for agricultural projects. We also recommend specifying appropriate units for these reporting items and being mindful of how moisture content and total volatile solids in feedstock impact biomethane generation potential.<sup>3</sup> A potentially useful point of comparison is the reporting requirements for RNG production under the federal Renewable Fuel Standard.<sup>4</sup>

### **The Draft Rule Should Better Clarify how to Demonstrate Reported End Uses for RNG**

With respect to reporting the categories of end uses that RNG is “distributed to” as required in §1384.5(b)(4) of the Draft Rule, we recommend the rule language be improved to eliminate overlap between categories.

For example, almost all RNG produced today is pipeline injected and comingled with fossil gas (and therefore moves through “gas utility systems”) prior to sinking with a unique specified end user (the party who claims the environmental benefits of the gas).<sup>5</sup> Once comingled with fossil gas, RNG becomes a physically interchangeable commodity. Therefore, RNG producers often will not know the final flow of their physical gas,<sup>6</sup> (just as it is extremely challenging to trace an individual unit of fossil gas from one gas well to any specific end user once it has been comingled in the gas system).

Further, the Draft Rule should address how to report when RNG is sold by a reporting party to an intermediary—such as wholesalers, aggregators, or dealers—rather than directly to final users. In RNG markets, and in markets for other fuels, intermediaries help enable price discovery, provide liquidity, and facilitate efficient distribution of RNG between small volume producers and small volume buyers.

As discussed in the next section, an electronic registry can be an important tool to help government transparently track the complexity of RNG ownership chains.

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<sup>3</sup> *Modelling the Technical Production Potential of Biomethane from Anaerobic Digestion to Decarbonise the Gas Grid*, Hurst and Allwood, Energy Policy, Volume 210, March 2026, 115041.

<https://www.sciencedirect.com/science/article/pii/S0301421525005488>

<sup>4</sup> For example, see [40 CFR Part 80, Subpart M](#) and [Subpart E](#).

<sup>5</sup> See the “RNG Disposition” column in the ANL RNG Database.

<sup>6</sup> The producer does usually know how the environmental attributes of the gas are claimed.



## **CEC Should Allow Voluntary Electronic Registry Use to Improve the Rigor of RNG Tracking**

In addition to the proposed regulatory requirements, we request that CEC support voluntary adoption of additional “off-the-shelf” tools to track contractual relationships between RNG buyers and sellers to establish the end use of RNG.

The use of electronic registries simplifies the tracking of market-based claims relative to review of a large volume of bilateral contracts. As the number of renewable natural gas facilities in California continues to grow, the CEC should support the development of electronic registries that can be used to track RNG ownership from buyer to seller across North America.

For example, the Clean Counts system is a leading registry for tracking both renewable power (renewable energy credits or RECs) and RNG (renewable thermal credits or RTCs) for voluntary buyers in North America.<sup>7</sup> Clean Counts currently facilitates the tracking of environmental attributes for renewable power in California’s Renewable Portfolio Standard, although that may be subject to change.<sup>8</sup>

Given the CEC’s history with determining eligibility<sup>9</sup> and appropriate tracking for renewable power projects, the CEC is uniquely suited to understand how these same conceptual issues could be applied for RNG. We recommend that the CEC work with the California Air Resources Board and the California Public Utilities Commission to support the harmonized use of an electronic registry for RNG.

Sincerely,

/s/

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<sup>7</sup> <https://www.mrets.org/>

<sup>8</sup> <https://www.wecc.org/announcements/20446-next-steps-wregis-weccs-non-statutory-program;>  
<https://cleancounts.org/blog/wecc/>

<sup>9</sup> For example, in maintaining the Renewables Portfolio Standard Eligibility Guidebook.