1. Feedstocks:
   - We strongly support inclusion of food waste in the state's RNG feedstock inventory as a critical resource for generation of RNG via anaerobic digestion, and a key pathway for reducing fugitive methane emissions from landfill

2. Cost Benefit Analysis / Cost-Effectiveness
   - A holistic approach should be taken in performing cost-benefit analysis of RNG, to include not only cost-effectiveness but also GHG reductions, carbon intensity, job creation, social benefit, etc. precedent exists for a value of RNG in excess of $26/MMBTU, based on California SB 1440, British Columbia Greenhouse Gas Reduction Regulation, and 2021 IWG estimates. This valuation should be considered in cost benefit analysis of RNG proposed as part of the study.

3. GHG Accounting Methodology
   - Support the study's proposed lifecycle accounting framework to accurately quantify the carbon intensity and methane reduction potential of RNG feedstock, including food waste. Numerous well-established models, including the CA GREET model, provide a negative CI score for RNG derived from food waste. Correctly accounting for the carbon impact of various feedstocks is critical to a robust and meaningful RNG program in Michigan, by enabling appropriate valuation of RNG based on environmental benefit.

4. Success in Michigan will require:
   - Long term fixed price RNG offtakes agreements are key to successful RNG deployment. As such, recommend consideration of mechanisms and incentives for such agreements, including avenues for expanded utility procurement of RNG.
   - Recommend programs to incentivize RNG interconnection and reduce interconnection costs, as high utility interconnection costs are often a barrier for all but the largest RNG facilities. Providing support for small- and medium-scale RNG facilities will facilitate expanded deployment throughout all Prosperity Regions in the state.
   - Encourage prioritization of RNG generated at wastewater treatment plants (WWTP), including expansion of incentives and financing programs for co-digestion at WWTP, as well as procurement targets specifically for RNG generated at WWTP. WWTP can support cost-effective RNG generation by leveraging existing AD infrastructure and by generating valuable D3 RINs.