

January 24th, 2022

Subject: Renewable Natural Gas Study Draft Outline Comments

Virginia Halloran
Michigan Public Service Commission
7109 W. Saginaw Highway
Lansing, MI 48917

Dear Ms. Halloran,

Michigan Farm Bureau appreciates the opportunity to provide comments on the Renewable Natural Gas Study Draft Outline and other pertinent topics to the Renewable Natural Gas Study direct by Public Act 87 of 2021. On-farm anaerobic digesters have become a popular topic in recent years and studies such as these assist possible anaerobic digester developers to understand the potential value in Michigan.

Michigan Farm Bureau is Michigan's largest general farm organization, serving over 40,000 farming families. We serve as the voice of Michigan agriculture and work to support, enhance, and protect the livelihood of our members. Recently, there has been increased discussions around having on-farm anaerobic digesters as a manure management mechanism to get a variety of benefits: reduced odors, reduced pathogens in the digestate, and an additional stream of revenue (to name a few).

The member-developed policy of Michigan Farm Bureau supports [expanding the use](#) of anaerobic digesters for energy production, [tax incentives](#) for power production from anaerobic digesters, and the utilization of digesters [to process food waste](#). When done correctly, digesters can provide a number of benefits to farmers.

Comments on Outline and Other Considerations

Anaerobic digesters have been around for a while, but the resurgence is due, in part, to a variety of more state specific initiatives. While Michigan Farm Bureau policy would not support all of the incentives that currently exist, it is worth examining increasing the availability of Michigan-based incentives and research (such as Michigan State University's [Anaerobic Digestion Research and Education Center](#)) to help ensure the development and viability of RNG production from on-farm digesters.

Given the nature of digesters and how they interact with agriculture, it is no surprise that the regulatory impacts span across many areas: air, energy, zoning, and water (to name a few). Reducing regulatory burden on the farmers and potential developers they may work with while also being protective of the environment would help reduce hurdles for the digester development. This would require looking beyond the scope of the MPSC's work. In addition, barriers may also be informational. Communities may not know or understand what a digester is or the benefits it might have for the farm and the broader community. Having resources that helps bridge the gap in knowledge at the local level may assist in preventing roadblocks from popping up.

Given the average size of Michigan's farms, especially the dairy farms, is lower than some of the other dairy producing states, a set-up that has been pursued by developers in Michigan has been 'community digesters' where multiple farms contribute to a single digester (generally on one of the farms). This provides enough manure for the digester to be economical, especially since every farm wouldn't have to have a digester. Providing additional opportunities and reducing regulatory burden for these types of set-ups would assist in increasing the potential for implementation of additional digesters. Examining these options may illuminate additional opportunities to increase RNG production from on-farm digesters.

Lastly, two considerations should be made when reviewing potential RNG supply, opportunities, barriers, and costs for on-farm RNG production. One, when utilizing information that is not publicly available, efforts should be made to protect the privacy of the farm and farmer(s) such as aggregating data at the Prosperity Regions level as is currently proposed. Two, while on-farm RNG production from anaerobic digesters has potential benefits for farmers, digesters are a significant investment and commitment for farms and should remain a voluntary practice. This is not a 'one size fits all' practice and farmers should be able to determine what makes sense for their operations.

Thank you for the opportunity to provide comments. If you have any questions or would like to discuss any of the above further, please feel free to reach out at the contact information provided below.

Sincerely,

Tess Van Gorder

Conservation & Regulatory Relations Specialist

Michigan Farm Bureau

tvangor@michfb.com

517-323-6711