Amp Americas

October 27, 2025

Sydney Vergis, Ph.D.
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**RE: AMP AMERICAS COMMENTS ON THE DRAFT SCOPE 1 AND 2 GHG REPORTING TEMPLATE**

Dear Dr. Vergis:

Amp Americas ("Amp"), a leader in the dairy digester and renewable natural gas ("RNG") sector, appreciates the opportunity to provide comments on the Draft Scope 1 and Scope 2 greenhouse gas ("GHG") Reporting Template, released on October 10, 2025. We encourage CARB to incorporate the following recommendations into the final rulemaking. In particular, AMP:

- Appreciates CARB's recognition of market-based accounting measures to recognize purchases of renewable gas and power
- Urges CARB to recognize the "Let Green Gas Count" initiative and align the recognition of RNG within the GHG accounting frameworks[1]
- Recommends CARB support the choice of one electronic registry across North America

**ABOUT AMP**

Founded in 2011, Amp develops, owns, and operates RNG facilities that convert dairy waste into renewable energy. Over our history, Amp's projects have prevented over 2.4 million metric tons of carbon equivalent emissions, and we plan to rapidly expand our impact over the next several years.

As a pioneer in the dairy RNG industry, Amp registered the first 5 dairy RNG-to-CNG pathways in California's Low Carbon Fuel Standard ("LCFS") program, and we were the RNG supplier for the first 11 dairy RNG-to-hydrogen pathways. Our experience developing, operating, and reporting on these and other assets gives us a unique perspective on the impact CARB policy has on investment and project development activity related to low carbon fuels.

Methane is a potent short-lived climate pollutant ("SLCP"), with a global warming potential over 80 times greater than carbon dioxide ("$CO_2$") over a 20-year period, making its near-term reduction one of the most impactful climate strategies available. California's leadership in avoided methane crediting under the LCFS demonstrates that valuing methane reductions catalyzes investment, scales projects, and delivers substantial climate benefits.

Our projects and resulting methane and $CO_2$ reductions have been made possible by CARB's leadership in decarbonizing transportation – and specifically in valuing avoided methane associated with dairy and other biogas projects. We encourage CARB to continue to support avoided methane accounting through

[1] https://letgreengascount.org/

the corporate climate disclosure rules, to ensure the most robust GHG accounting and encourage actions that lead to additional GHG emission reductions – especially of potent SLCP emissions.

**Impact Reporting and Actions to Reduce Climate Impacts**

Amp joins the RNG Coalition in supporting CARB's inclusion of line items in the Draft Template that allow reporters to use market-based accounting to recognize purchases of renewable gas and power. This approach also provides companies with the flexibility to use market-based methods for RNG purchased directly from renewable suppliers or through utility green tariff programs.

Amp urges CARB to create a voluntary impact accounting pathway for companies to report on concrete actions they are taking to mitigate emissions. This should include incorporating voluntary disclosure of methane reduction initiatives, especially actions to reduce potent SLCPs. Incorporating impact accounting alongside inventory accounting will ensure that any reporting provides a full picture of climate impacts, while simultaneously elevating leading practices by businesses investing in projects that deliver the greatest climate benefits.

**Electronic Registries and Additional Voluntary Options to Improve Rigor of Market-Based Claims**

As is argued in the RNG Coalition's letter, CARB should support additional voluntary options, particularly electronic registries, to improve the rigor of market-based claims. As the number of RNG facilities grow, CARB should support the use of a single nationwide registry, such as the Clean Counts system, which tracks both renewable power and RNG for voluntary buyers across North America.[2] This will simplify the tracking process, which will be critical as the number of renewable natural gas facilities grow.

**CONCLUSION**

Thank you again for the opportunity to comment on the Draft Template. We appreciate your consideration of these recommendations and welcome continued engagement as the process progresses. Please do not hesitate to contact us for further information or clarification.

Sincerely,

Cassandra Farrant

Cassandra Farrant
Head of Environmental Programs and Regulatory Affairs
Amp Americas

[2] https://cleancounts.org/