



June 1, 2026

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

RE: AMP AMERICAS COMMENTS ON THE SB 253 PUBLIC WORKSHOP: CALIFORNIA CORPORATE GREENHOUSE GAS REPORTING PROGRAM

Dear Dr. Vergis:

Amp Americas (“Amp”) appreciates the opportunity to provide comments on the March 23, 2026, SB 253 Public Workshop: California Corporate Greenhouse Gas Reporting Program (“Workshop”). We support development of the Corporate Greenhouse Gas Reporting Program (“Program”) and endorse current and previous^{1,2} comments submitted by the RNG Coalition. We reinforce our previous comments regarding the Scope 1 and 2 reporting template,³ including strong support for recognizing market-based purchases of renewable gas, like the “Let Green Gas Count” initiative,⁴ and use of a single nationwide registry, such as the Clean Counts system,⁵ to simplify the tracking process.

Renewable fuels, especially renewable natural gas (“RNG”), provide multiple important climate benefits, which should be fully accounted for in climate disclosure reporting. Complete accounting for both avoided methane benefits and direct carbon benefits from renewable fuels is an important step to decarbonizing the economy, in both hard-to-abate sectors today, and as part of the future energy transition.

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 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.

¹https://ww2.arb.ca.gov/system/files/webform/public_comments/22751/RNG%20Coalition%20Comments%20on%20Information%20Solicitation%20CA%20Climate%20Disclosure.pdf

² https://ww2.arb.ca.gov/system/files/webform/public_comments/53536/251026-rng-coalition-comments-on-draft-scope-1-and-2-ghg-reporting-template.pdf

³ https://ww2.arb.ca.gov/system/files/webform/public_comments/53861/amp-scope-1---2-template-comment-letter.pdf

⁴ <https://letgreengascount.org/>

⁵ <https://cleancounts.org/>



ACCOUNTING FOR AVOIDED METHANE PROVIDES SIGNIFICANT CLIMATE BENEFITS

Methane is a potent short-lived climate pollutant (“SLCP”), with a global warming potential over 80 times greater than carbon dioxide (“CO₂”) 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 CO₂ 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 supporting avoided methane accounting through the corporate climate disclosure rules, to ensure the most robust greenhouse gas (“GHG”) accounting and encourage actions that lead to additional GHG emission reductions – especially of potent SLCP emissions.

Public companies with climate commitments are actively pursuing decarbonization solutions – particularly in hard-to-electrify industrial sectors that remain reliant on natural gas. Dairy RNG offers an efficient and scalable pathway to reduce emissions for these users, many of whom have expressed strong interest in biomethane procurement to meet GHG targets. CARB should develop rules that both preserve avoided methane accounting and enable access to viable, market-ready decarbonization solutions.

WORKSHOP FEEDBACK

We appreciate CARB hosting the workshop and requesting feedback on specific questions, which we address below.

Q: *What accounting methods does your organization currently use for Scope 1, 2, and 3 GHG emissions?*

Q: *Should CARB consider allowing other accounting methods? If so, which ones and why?*

A: CARB should ensure that the full climate benefits of renewable fuels, including green molecules like RNG, are recognized through comprehensive impact accounting across Scope 1, 2, and 3 emissions, gross carbon flux, and impact. Critically, CARB must ensure that avoided methane emissions associated with RNG projects are fully accounted for in the Scopes/net accounting framework, in addition to the methane and CO₂ benefits associated with a reporting entity’s use of biogenic product emissions accounting, as outlined in the Greenhouse Gas Protocol’s Land Use, Land-Use Change, and Forestry Standard, Version 1.0.

CARB should support a breakdown of lifecycle emissions accounting for renewable fuels and RNG into Scopes 1-3/impact using supplier-specific emissions factors. Supplier specific emissions factors can be provided prior to the approval of impact reporting accounting standards, and audited by third party verifiers to ensure accuracy.



Robust, widely accepted lifecycle analysis (“LCA”) models—such as the Department of Energy’s Argonne National Labs GREET model and CARB’s LCFS Tier 1 calculators—already provide the foundation for accurate GHG accounting of renewable fuels. These models can be readily converted into supplier-specific emissions factors for Scope reporting, ensuring avoided methane benefits are fully captured and enabling market-based frameworks that deliver verified emissions reductions to downstream customers.

The RNG industry and other stakeholders are currently working through these issues through the Clean Energy Accounting Project (“CEAP”) molecule group and in conjunction with the GHG Protocol Action and Market Instruments (“AMI”) working group. We urge CARB to follow these proceedings and create Scope 1, 2, 3, and impact reporting regulations and templates that accommodate these consensus-based procedures as they are developed. We also urge CARB to follow precedent from its other programs, like the LCFS, which demonstrate that incorporating lifecycle analysis into emissions accounting is essential for a comprehensive understanding of an entity’s environmental impacts.

Q: What criteria should emission factors meet to be used in this program?

Q: How should reporters document and explain their use of a particular emission factor, including proprietary models?

Q: How should reporters document and explain when changing EFs from a prior year?

A: CARB should allow for the use of the GREET model and for LCFS carbon intensity (“CI”) scores to be broken down into Scope 1-3 and impact emissions factors. This will align the Program with CARB’s existing climate policies and will support transitioning renewable fuels from the transportation sector to other hard-to-abate sectors, in line with CARB’s priorities as articulated in the 2022 Scoping Plan.⁶ The LCFS includes existing supplier-specific and other emissions factors and reporting data approved by CARB, which should be allowed to be included in corporate climate reporting, where applicable. Where lifecycle-specific emissions factors are used, they should be updated annually, based on updated carbon intensity reporting under the LCFS, to cover the most recent data and align with the climate disclosure reporting year.

Q: Option 3: Category Phase-In: Are these the appropriate categories to prioritize for initial reporting based on data availability and relevance across sectors?

A: Amp supports Option 3 and phasing in Scope 3 reporting by categories, which will minimize costs for reporting entities, according to CARB’s estimates (slide 36). We support the proposed categories for initial reporting, including beginning with fuel and energy-related activities (Category 3), among other frequently reported activities.

⁶ <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>



CONCLUSION

Thank you again for the opportunity to comment on the Workshop and Program. 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 Credit Compliance
Amp Americas