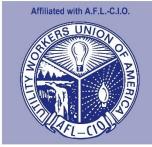
UTILITY WORKERS UNION OF AMERICA

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June 2, 2023

The Honorable John Podesta The White House 1600 Pennsylvania Ave. NW Washington, DC 20500

Dear Mr. Podesta,

Our union, the Utility Workers Union of America (UWUA), representing some 45,000 workers nationally in the electric, gas and water utility sectors, writes today to support the Environmental Protection Agency's proposal to include as wide a definition of renewable electricity as possible in the Renewable Fuel Standard program. We urge the Administration to finalize its eRIN proposal without delay such that eRINs may be generated beginning in 2024, while enabling the participation of biogas and solid biomass feedstocks as qualifying sources of renewable electricity.

President Biden's ambitious goal of building 500,000 charging stations will require a robust and reliable power grid drawing from a diverse set of sustainable power sources such as renewables, base-load renewables, storage, and other base-load contributors.

In particular, renewable biogas and biomass power bring abundant co-benefits for utility workers. Both biogas and biomass power facilities require significant labor to operate and maintain, while providing the type of family and community-supporting jobs that make our economy more just and equitable. Further, biogas facilities reduce methane emissions, and biomass facilities help reduce forest fire risk, which can protect people, communities, and infrastructure and make our members' jobs safer in fire-prone areas. Baseload renewable power from resources like biogas and biomass should be a critical component of a healthy and efficient grid.

The EPA should establish pathways to enable biogas and biomass feedstocks to participate in the eRIN program at the earliest possible opportunity. Further, the EPA should expand the definition of renewable biomass to allow RFS qualification of all fuel removed from federal land to reduce wildfire risk and improve forest restoration efforts. EPA action approving biomass power pathways in the RFS will help keep biomass power facilities online and contributing to ongoing resource management and fire prevention efforts.

For these reasons, we support the inclusion of biogas and biomass feedstocks in the eRIN program as soon as possible.

Sincerely,

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James T. Slevin National President Utility Workers Union of America, AFL-CIO