

Ag-Grid Energy LLC 7 Greenbriar Lane Kennett Square, PA 19348

May 23, 2023

Mr. Dan Utech Chief of Staff, *Environmental Protection Agency* 1200 Pennsylvania Avenue, N.W. Washington, D.C. 20460

Mr. Utech:

Ag-Grid Energy is a dairy anaerobic digester developer with a mission to partner with small to mid-size dairy farms to improve their economic and environmental sustainability. This mission was born from the widespread consolidation occurring in the dairy industry, which is seeing the disappearance of small and mid-size dairy farms at record rates in favor of large-scale factory farms. Since 2016, we have constructed 5 digesters co-located on these farms and have proven that digester technology is a solution to creating additional revenue streams for farmers, mitigating on-farm methane emissions, and providing additional renewable electricity to the grid.

Ag-Grid Energy was very concerned about a Reuters article earlier this month that suggested the commencement of the eRINs program, as laid out in the SET Rule that was proposed in December, may be delayed. An electric pathway is critical to keeping these small and mid-size dairy farms, businesses that have been around for generations, economically viable. While the RNG pathway is well-established, it really only benefits large dairies and further promotes consolidation of the dairy industry. Putting eRINs back on the table is vital to keeping these small businesses alive. Moreover, eRINs are vital to boosting production of domestic EVs and will support a renewables industry that is a critical component of achieving President Biden's climate goals.

This is an extremely important issue, and we are sending this letter to you in hope that it is received by the appropriate person in Administrator Regan's office. Please do not hesitate to reach out to us with any questions or for further information.

Regards,

Rashi Akki

DocuSigned by:

Founder & CEO, Ag-Grid Energy LLC

rashi.akki@aggridenergy.com

(610) 574-8737

Lent Hill Dairy Farm (2,000 dairy cows)

Walmoore Holsteins (1,000 dairy cows)

Walt Moore Owner

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DocuSigned by: Ken Verhelle Andrew Ferguson Director, Food Waste Strategy & Operations Director, Business Development Ag-Grid Energy Ag-Grid Energy DocuSigned by: DocuSigned by: abu akki -26E409F28798420 Abu Akki Dan Woodger Director, Business Development Co-owner Ag-Grid Energy **Rockwood Ag-Grid Organics** -DocuSigned by: -DocuSigned by: Doug Woodger Greg Peracelio **Doug Woodger Greg Peracchio** Owner Owner Rockwood Farms (600 dairy cows) Hytone Farms (400 dairy cows) DocuSigned by: DocuSigned by: kies Orr LaVack Jared LaVack Kies Orr Lavack Jared Lavack Co-owner Co-owner Fort Hill Farms (200 dairy cows) Fort Hill Farms (200 dairy cows) DocuSigned by: DocuSigned by: Daryl Williams Paul Wolcott B32FF7F2EDF1469 **Paul Wolcott Darryl Williams** Owner Owner

Luther Belden Farms (180 dairy cows)