



August 17, 2018

The Honorable Andrew Wheeler

Acting Administrator

Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C., 20460

Dear Acting Administrator Wheeler:

Edge Dairy Farmer Cooperative writes in support of activating the Electric Pathway, under the Renewable Fuel Standard (RFS) program, in 2018. Edge represents dairy farmers of all sizes throughout nine Midwestern states. The cooperative is devoted to providing our farmers with tools and policies they need to operate a successful dairy farm. We are based in Wisconsin, where many of our members, America's dairy farmers, call home. It's also the state with the most operational anaerobic digesters.

Several of our members operate digesters to process animal manure to produce baseload electricity. The Electric Pathway allows electricity produced on farms to qualify as a renewable fuel under RFS, representing a near-term opportunity for extra revenue from the electricity they produce. This new revenue stream would immediately support the numerous farmers who have already made significant investments in digesters, and it would assist hundreds of other Midwestern farmers in doing the same.

Our farmers are keenly aware of new practices and technologies that allow them to efficiently and effectively produce food, while taking great care of their animals, communities and natural resources. Digesters help farmers do just that. In addition to producing renewable energy, the digesters can protect water quality by reducing pathogens and nutrients in the manure before it is applied to fields. These systems help farmers manage manure and can mitigate nutrient runoff related algal blooms, giving farmers a tool to help maintain compliance with increasingly stringent state environmental regulations.

With anaerobic digester technology, farmers have more flexibility in how they run their businesses. Activating the Electric Pathway would allow dairy farmers to bring in meaningful additional revenue, mitigate market risk, meet regulatory requirements, further invest in digester technology and have opportunities to position their farms for long-term success. In addition to supporting farmers, the Pathway fits squarely within the Administration's goals of promoting economic development and revitalization, job growth and investment in rural America.

We strongly encourage EPA to move forward in implementing the Electric Pathway this year.

Edge appreciates your consideration of our comments and your attention to this important matter. Please consider us a resource should you want additional insights.

Sincerely,

Brody Stapel
President

Cc: The Honorable Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250