



National Milk Producers Federation

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Agri-Mark, Inc.
Associated Milk
Producers Inc.
Bongards' Creameries
Cooperative Milk
Producers Association
Cortland Bulk Milk
Producers Cooperative
Dairy Farmers of
America, Inc.
Ellsworth
Cooperative Creamery
FarmFirst Dairy
Cooperative
First District Assoc.
Foremost Farms USA
Land O'Lakes, Inc.
Lone Star Milk
Producers
Maryland & Virginia
Milk Producers
Cooperative Association
Michigan Milk
Producers Association
Mid-West
Dairymen's Company
Mount Joy Farmers
Cooperative Association
Northwest Dairy Assoc.
Oneida-Madison Milk
Producers Cooperative
Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto County
Cooperative Milk
Producers' Association
Select Milk
Producers, Inc.
Southeast Milk, Inc.
St. Albans Cooperative
Creamery, Inc.
Swiss Valley Farms
Tillamook County
Creamery Association
United Dairymen
of Arizona
Upstate Niagara
Cooperative, Inc.
Zia Milk
Producers, Inc.

September 1, 2017

The Honorable Scott Pruitt
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Administrator Pruitt:

I am writing to you regarding the renewable electricity pathway under the Renewable Fuel Standard (RFS) program. The National Milk Producers Federation, based in Arlington, VA, develops and carries out policies to advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of more than 32,000 dairy producers on Capitol Hill and with government agencies.

Many of our member-owners operate anaerobic digesters, which use manure and other organic wastes to produce baseload electricity. The electricity pathway allows electricity produced on farms and sold to a commercial electrical grid to qualify as a renewable fuel under the RFS. We understand that EPA solicited commentary on the pathway through the issuance of the Renewables Enhancement and Growth Support proposed rulemaking in November 2016.

NMPF is supportive of the electricity pathway. Should EPA approve applications under the pathway to use electricity produced at agricultural anaerobic digesters, dairy farms throughout the U.S. may benefit from the generation of Renewable Identification Numbers in accordance with the RFS. This would make biogas produced with manure significantly more valuable, giving dairy farmers a unique environmental stewardship opportunity. We therefore encourage EPA to act quickly and urgently to implement the electricity pathway.

Thank you for your consideration of these comments. Please do not hesitate to contact us should you wish to discuss this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mulhern". The signature is fluid and cursive, with a large initial "M" and a trailing flourish.

James Mulhern
President & CEO
National Milk Producers Federation