

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Commission’s Rules Relating)
to Renewable Natural Gas Programs) **File No. GX-2024-0326**

RAES COMMENTS

COMES NOW Roeslein Alternative Energy Services, LLC (“RAES” or “Company”), and in response to the Missouri Public Service Commission’s (“Commission”) *Notice of Hearing and Comment Period*, states as follows:

1. On May 15, 2024, the Commission issued an *Order Finding Necessity and Order Directing Proposed Rule 20 CSR 4240-40.100 Be Filed for Publication*. Subsequently, on May 23, 2024, the Commission issued its *Notice of Hearing and Comment Period*, stating among other things, that any written comments must be received by the Commission’s offices on or before July 17, 2024.

2. RAES has reviewed Proposed Rule 20 CSR 4240-40.100 and believes that 20 CSR 4240-40.100(2)(I) should be expanded to also include state-regulated credit and voluntary credit programs, where appropriate. This could be accomplished by amending that provision as follows:

“All prospective sales of Renewable Identification Numbers for RNG, or other sales for RNG credit;”

3. Examples of other such programs would be:
- a. the Low Carbon Fuel Standard (LCFS) available from California, Washington, New York, New Mexico, or other states; and,
 - b. The International Sustainability and Carbon Certification (ISCC) program. The ISCC EU+ program is a voluntary program matching

producers of renewable natural gas with prospective buyers. ISCC certifies the RNG producers and assesses a “Greenhouse Gas Emissions” score for the benefit of the buyers.

Respectfully submitted,

//S// Tim Johnston
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 17th day of July, 2024:

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