

Appointment

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**From:** Thad Kurowski [tkurowski@tesla.com]  
**Sent:** 11/17/2021 6:22:23 PM  
**To:** Borgert, Kyle [borgert.kyle@epa.gov]  
  
**Subject:** Accepted: EPA and Tesla ERINS Discussion  
**Location:** Microsoft Teams Meeting  
  
**Start:** 11/22/2021 7:00:00 PM  
**End:** 11/22/2021 8:00:00 PM  
**Show Time As:** Busy

Appointment

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**From:** Ana Stewart [astewart@tesla.com]  
**Sent:** 11/21/2021 12:25:11 AM  
**To:** Borgert, Kyle [borgert.kyle@epa.gov]  
**Subject:** Accepted: EPA and Tesla ERINS Discussion  
**Location:** Microsoft Teams Meeting  
**Start:** 11/22/2021 7:00:00 PM  
**End:** 11/22/2021 8:00:00 PM  
**Recurrence:** (none)

Appointment

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**From:** Will Martin [willmartin@tesla.com]  
**Sent:** 11/19/2021 4:18:20 PM  
**To:** Borgert, Kyle [borgert.kyle@epa.gov]  
  
**Subject:** Accepted: EPA and Tesla ERINS Discussion  
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**From:** Rohan Patel [rohpatel@tesla.com]  
**Sent:** 11/17/2021 6:49:35 PM  
**To:** Borgert, Kyle [borgert.kyle@epa.gov]  
  
**Subject:** Accepted: EPA and Tesla ERINS Discussion  
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**Recurrence:** (none)

Message

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**From:** Borgert, Kyle [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EEC192BAF6E34A9194575364273F5802-BORGERT, KY]  
**Sent:** 11/9/2021 2:28:39 PM  
**To:** Michael Goo [mgoo@waxmanstrategies.com]; Machiele, Paul [machiele.paul@epa.gov]  
**Subject:** RE: meeting with Electrify America

Michael,

I was out on vacation the back half of last week and just got to your message. I can be available a few times next week to meet with you. I have the following time slots available currently:

Monday 15<sup>th</sup>: 2pm-4pm  
Tuesday 16<sup>th</sup>: 9am-11am  
Wednesday 17<sup>th</sup>: 1pm-3pm

Let me know if any of those times would be feasible and we will get something scheduled.

Thank You Kindly,  
Kyle

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**From:** Michael Goo <mgoo@waxmanstrategies.com>  
**Sent:** Friday, November 05, 2021 11:24 AM  
**To:** Machiele, Paul <machiele.paul@epa.gov>; Borgert, Kyle <borgert.kyle@epa.gov>  
**Subject:** FW: meeting with Electrify America

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**From:** Michael Goo  
**Sent:** Monday, October 25, 2021 3:54 PM  
**To:** [machiele.paul@epa.gov](mailto:machiele.paul@epa.gov); [borgert.kyle@epa.gov](mailto:borgert.kyle@epa.gov)  
**Cc:** Noah Rothstein <[noah@waxmanstrategies.com](mailto:noah@waxmanstrategies.com)>  
**Subject:** meeting with Electrify America

Hey Paul and Kyle:

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**From:** Nelson, Matthew <[Matthew.Nelson@electrifyamerica.com](mailto:Matthew.Nelson@electrifyamerica.com)>

**Sent:** Friday, October 15, 2021 7:11 PM

**To:** Dunham, Sarah <[Dunham.Sarah@epa.gov](mailto:Dunham.Sarah@epa.gov)>; Poliakoff, Andrew <[Andrew.Poliakoff@electrifyamerica.com](mailto:Andrew.Poliakoff@electrifyamerica.com)>; Michael Goo <[mgoo@waxmanstrategies.com](mailto:mgoo@waxmanstrategies.com)>; Haley Armstrong <[harmstrong@ajw-inc.com](mailto:harmstrong@ajw-inc.com)>; Charmley, William <[charmley.william@epa.gov](mailto:charmley.william@epa.gov)>; Machiele, Paul <[machiele.paul@epa.gov](mailto:machiele.paul@epa.gov)>; Herbolsheimer, Courtney <[herbolsheimer.courtney@epa.gov](mailto:herbolsheimer.courtney@epa.gov)>; Hengst, Benjamin <[Hengst.Benjamin@epa.gov](mailto:Hengst.Benjamin@epa.gov)>; Chris Miller <[cmiller@ajw-inc.com](mailto:cmiller@ajw-inc.com)>; Simon, Karl <[Simon.Karl@epa.gov](mailto:Simon.Karl@epa.gov)>

**Cc:** Kirkbride, Robin <[Kirkbride.Robin@epa.gov](mailto:Kirkbride.Robin@epa.gov)>; Gonzalez, Gail <[Gonzalez.Gail@epa.gov](mailto:Gonzalez.Gail@epa.gov)>; Noah Rothstein <[noah@waxmanstrategies.com](mailto:noah@waxmanstrategies.com)>

**Subject:** RE: meeting with Electrify America

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Sarah,

Please accept my sincere thanks to you and your team for taking time to meet with us last week. As you requested, I have attached a copy of the presentation, which contains confidential business information and is therefore shared in confidence.

In addition, I have attached a recent filing that Electrify America made on demand charges in New Jersey, and below are links to each of the papers referenced during our discussion, or in the slides.

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- **Slide 6:** NREL (2021): [There's No Place Like Home: Residential Parking, Electrical Access, and Implications for the Future of Electric Vehicle Charging Infrastructure](#) (notes that more than half of vehicles lack access to electricity for overnight parking and very few residents of apartment complexes have access to residential charging)
- **Slide 6:** Joint Center For Housing Studies of Harvard University (2018): [The State of the Nation's Housing](#); Bloomberg CityLab: [Who Owns a Home in America, in 12 Charts](#) (indicates that individuals in condos/apartments and those who rent tend to be lower-income with significant disparities in race and ethnicity)
- **Slide 7:** Oak Ridge National Laboratory (2018): [Could a bioenergy program stimulate electric vehicle market penetration? Potential impacts of biogas to electricity annual rebate program](#) (projects that the eRIN program would result in deployment of 19.7 million additional EVs above baseline by 2030)
- **Slide 7:** DOE: [Biogas Opportunities Roadmap](#) (notes the methane emission reductions that would occur through heightened biogas capture)

We look forward to further conversations, and to that end, I would like to reiterate that we are happy to present this to others on your staff. Michael will of course follow up directly with Kyle to offer a briefing, as was suggested during the call, but we would also be happy to brief others at OTAQ if you suggest.

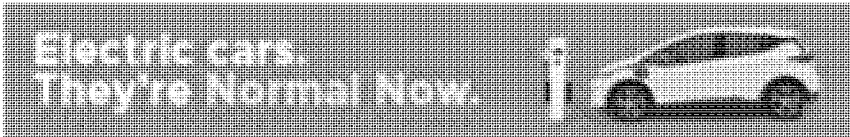
Research shows that eRINs would do more to enable attainment of President Biden's 2030 goals of 500,000 charging stations and 50% EV sales than any other policy under current law. Operating cost challenges threaten the charging industry's ability to sell its low carbon fuel for less than gasoline, but that is a problem the RFS was tailor designed to address. eRINs would help address that challenge, thereby serving as a companion operating cost strategy to the proposed \$7.5B capital investment in EV charging laid out in the Infrastructure Investment and Jobs Act. For these reasons, we encourage EPA to act on this opportunity with urgency.

Please have a lovely weekend, and please view us as a resource as you consider a path forward on this very important opportunity.

Sincerely,

**Matthew B. Nelson**  
Director of Government Affairs

Electrify America  
2003 Edmund Halley Drive  
2<sup>nd</sup> Floor, Suite 200  
Reston, VA 20191  
m: +1 (571) 352-8840  
[matthew.nelson@electrifyamerica.com](mailto:matthew.nelson@electrifyamerica.com)



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Message

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**From:** Borgert, Kyle [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EEC192BAF6E34A9194575364273F5802-BORGERT, KY]  
**Sent:** 11/9/2021 10:27:08 PM  
**To:** Michael Goo [mgoo@waxmanstrategies.com]; Machiele, Paul [machiele.paul@epa.gov]  
**CC:** 'Nelson, Matthew' [matthew.nelson@electrifyamerica.com]; Poliakoff, Andrew [Andrew.Poliakoff@electrifyamerica.com]; 'Dick, Andrew' [andrew.dick@electrifyamerica.com]; Chris Miller [cmiller@ajw-inc.com]; Carl Leighty [carl@waxmanstrategies.com]; Haley Armstrong [harmstrong@ajw-inc.com]  
**Subject:** RE: meeting with Electrify America

That will work for me Michael. Please go ahead and arrange the zoom call.

Thank You,  
Kyle

---

**From:** Michael Goo <mgoo@waxmanstrategies.com>  
**Sent:** Tuesday, November 09, 2021 4:50 PM  
**To:** Borgert, Kyle <borgert.kyle@epa.gov>; Machiele, Paul <machiele.paul@epa.gov>  
**Cc:** 'Nelson, Matthew' <matthew.nelson@electrifyamerica.com>; Poliakoff, Andrew <Andrew.Poliakoff@electrifyamerica.com>; 'Dick, Andrew' <andrew.dick@electrifyamerica.com>; Chris Miller <cmiller@ajw-inc.com>; Carl Leighty <carl@waxmanstrategies.com>; Haley Armstrong <harmstrong@ajw-inc.com>  
**Subject:** RE: meeting with Electrify America

Hi Kyle and Paul:

Thanks for getting back to me---sorry I managed to email you during your time off---hope you had a good one.

It looks like we can meet Monday the 15<sup>th</sup> at 3 pm.

If that still works for you, we will send a zoom . I think you have the powerpoint, but we will forward it again in advance of the meeting...

Talk to you soon...

---

**From:** Borgert, Kyle <borgert.kyle@epa.gov>  
**Sent:** Tuesday, November 9, 2021 9:29 AM  
**To:** Michael Goo <mgoo@waxmanstrategies.com>; Machiele, Paul <machiele.paul@epa.gov>  
**Subject:** RE: meeting with Electrify America

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**Cc:** Kirkbride, Robin <[Kirkbride.Robin@epa.gov](mailto:Kirkbride.Robin@epa.gov)>; Gonzalez, Gail <[Gonzalez.Gail@epa.gov](mailto:Gonzalez.Gail@epa.gov)>; Noah Rothstein <[noah@waxmanstrategies.com](mailto:noah@waxmanstrategies.com)>  
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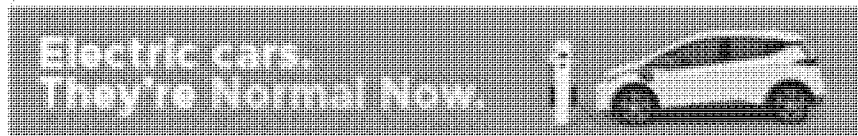
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**Sent:** 8/17/2021 9:18:28 PM  
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**Subject:** Accepted: Chris Hessler Meeting w/ EPA  
**Location:** Microsoft Teams Meeting  
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**Recurrence:** (none)

Kyle –

Thank you for setting this up.

I am representing Electrify America. We want to understand the path and approach that EPA may take for developing a regulation for eRIN pathways, how that will interact with a potential Set Rule, the timing on both, and what your approach will be to ensuring there are sufficient market signals to drive the build out of charging infrastructure.

Hope that is helpful.

I will also be inviting 2 colleagues to join us, schedule permitting.

H

Message

---

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Get [Outlook for iOS](#)

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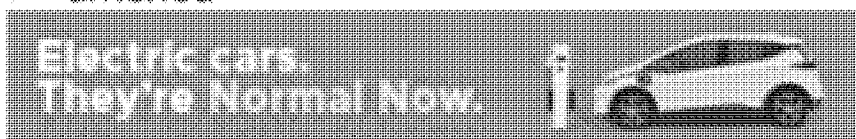
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m: +1 (571) 352-8840  
[matthew.nelson@electrifyamerica.com](mailto:matthew.nelson@electrifyamerica.com)



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**Sent:** 1/21/2021 8:32:49 PM  
**To:** Burkholder, Dallas [burkholder.dallas@epa.gov]  
**CC:** Borgert, Kyle [borgert.kyle@epa.gov]  
**Subject:** RE: eRIN technical discussion

Perfect. Thanks Dallas, and Microsoft Teams works well.

---

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**Sent:** Thursday, January 21, 2021 3:32 PM  
**To:** Rohan Patel <rohpatel@tesla.com>  
**Cc:** Borgert, Kyle <borgert.kyle@epa.gov>  
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Rohan,

Thanks for your quick response. How about we plan to talk next Wednesday (1/27/2021) from 2-3pm EST? I can send a Microsoft Teams meeting invite if that time works for you, or if another platform (or just a conference call number) works better just let me know. Looking forward to meeting with you next week.

Dallas Burkholder  
Office of Transportation & Air Quality  
US Environmental Protection Agency  
(734)214-4766  
[Burkholder.Dallas@epa.gov](mailto:Burkholder.Dallas@epa.gov)

---

**From:** Rohan Patel <rohpatel@tesla.com>  
**Sent:** Thursday, January 21, 2021 12:00 PM  
**To:** Burkholder, Dallas <burkholder.dallas@epa.gov>  
**Cc:** Borgert, Kyle <borgert.kyle@epa.gov>  
**Subject:** RE: eRIN technical discussion

Dallas,

Bill mentioned that you're leading the effort on eRINs and we'd be happy to meet with you and the EPA team on this topic. Let us know a good time for you and the team, and we'll find a way to make it work. As a start, would next week on Wednesday sometime between 1-5:30pm EST work for you guys? If you need to catch me in the interim, my cell phone number is 317-532-7898

Best,

Rohan

Rohan Patel | Senior Global Director, Public Policy and Business Development  
+1 317-532-7898 | [rohan@tesla.com](mailto:rohan@tesla.com)

**T E S L A**



---

**From:** Burkholder, Dallas <[burkholder.dallas@epa.gov](mailto:burkholder.dallas@epa.gov)>  
**Sent:** Wednesday, January 20, 2021 9:32 AM  
**To:** Rohan Patel <[rohpatel@tesla.com](mailto:rohpatel@tesla.com)>  
**Cc:** Borgert, Kyle <[borgert.kyle@epa.gov](mailto:borgert.kyle@epa.gov)>  
**Subject:** eRIN technical discussion

Rohan,

My name is Dallas Burkholder, and I work at EPA in our Assessment and Standards Division under Bill Charmley. I'm part of the team that has been working on the topic of potential regulatory structures for electricity under the RFS program. Bill passed along your name and contact information to me and mentioned that you, and potentially others at Tesla, may be interested in a technical discussion with myself and others here at EPA who are working on this topic. Would you be available to meet with us sometime in the next week or two? If you are available, please send me several times that would work from your side, and I'll check schedules here at EPA and try to get something scheduled. Thanks

Dallas Burkholder  
Office of Transportation & Air Quality  
US Environmental Protection Agency  
(734)214-4766  
[Burkholder.Dallas@epa.gov](mailto:Burkholder.Dallas@epa.gov)

Message

---

**From:** Chris Hessler [CHessler@ajw-inc.com]  
**Sent:** 8/17/2021 4:15:47 PM  
**To:** Hengst, Benjamin [Hengst.Benjamin@epa.gov]  
**CC:** Simon, Karl [Simon.Karl@epa.gov]; Charmley, William [charmley.william@epa.gov]; Michael Goo [mgoo@waxmanstrategies.com]; Haley Armstrong [harmstrong@ajw-inc.com]  
**Subject:** RE: Meeting Request re: eRINs  
  
**Flag:** Follow up

Ben –  
Just looping back on this to see if we can get something on the calendar.  
H

---

**From:** Chris Hessler  
**Sent:** Friday, August 6, 2021 2:46 PM  
**To:** Hengst, Benjamin <Hengst.Benjamin@epa.gov>  
**Cc:** Simon, Karl <Simon.Karl@epa.gov>; Charmley, William <charmley.william@epa.gov>; Michael Goo <mgoo@waxmanstrategies.com>; Haley Armstrong <harmstrong@ajw-inc.com>  
**Subject:** Re: Meeting Request re: eRINs

Thanks, Ben.  
It makes sense for us to hear from Bill as well on this. Let us know what works upon Bill's return.

Glad to hear yesterday went smoothly.  
H

On Aug 6, 2021, at 11:35, Hengst, Benjamin <Hengst.Benjamin@epa.gov> wrote:

Hi Chris—thanks for the note. Yesterday turned out fairly well, at least as event-planning goes =) More importantly, it's good that we got a proposal out to start the next step in things.

I've looped in Bill Charmley to this conversation, as his team has the lead on this process (eRINs), because working on light and heavy duty rules just wasn't enough for Bill. Ha ha.

Having said that, Bill is out next week. Let me know if you want to try to meet next week – in which case I'll wrangle a few folks on to a call – or if you want to wait until later this month.

---

**From:** Chris Hessler <CHessler@ajw-inc.com>  
**Sent:** Wednesday, August 4, 2021 7:35 PM  
**To:** Simon, Karl <Simon.Karl@epa.gov>; Hengst, Benjamin <Hengst.Benjamin@epa.gov>  
**Cc:** Michael Goo <mgoo@waxmanstrategies.com>; Haley Armstrong <harmstrong@ajw-inc.com>  
**Subject:** Meeting Request re: eRINs

Karl & Ben –  
**First** – congratulations on getting to the eve of the WH event for the LD rule. One imagines that was a fun little cakewalk for you.

Good luck with the rollout, and hopefully everyone praises your good work, just like always happens when EPA proposes rules.

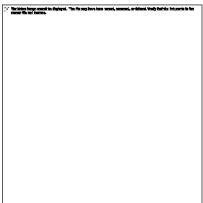
**Second**, next week, or as soon as you have a chance to catch your breath, could you please find 30 minutes to discuss the regulatory process and approach on eRINs?

To spoil any surprise, we have 2 areas of interest to explore with you:

1. How can our teams/clients be helpful working with EPA and stakeholders to ensure that the rule process moves as swiftly as possible?
2. What approaches might be most viable for ensuring that EPA's approach to eRINs maximizes market pull for expanding charging infrastructure?

Let me know when we might find time for a call.

H



**Christopher Hessler | Partner | AJW, Inc.**  
2200 Wilson Blvd, Suite 310, Arlington, VA 22201  
M: 202.460.0945  
[chessler@ajw-inc.com](mailto:chessler@ajw-inc.com)  
[www.ajw-inc.com](http://www.ajw-inc.com)

## Message

**From:** Nelson, Matthew [Matthew.Nelson@electrifyamerica.com]  
**Sent:** 10/15/2021 11:11:26 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]; Poliakoff, Andrew [Andrew.Poliakoff@electrifyamerica.com]; Michael Goo [mgoo@waxmanstrategies.com]; Haley Armstrong [harmstrong@ajw-inc.com]; Charmley, William [charmley.william@epa.gov]; Machiele, Paul [machiele.paul@epa.gov]; Herbolzheimer, Courtney [herbolzheimer.courtney@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Chris Miller [cmiller@ajw-inc.com]; Simon, Karl [Simon.Karl@epa.gov]  
**CC:** Kirkbride, Robin [Kirkbride.Robin@epa.gov]; Gonzalez, Gail [Gonzalez.Gail@epa.gov]; Noah Rothstein [noah@waxmanstrategies.com]  
**Subject:** RE: meeting with Electrify America  
**Attachments:** EPA Outreach Deck - contains CONFIDENTIAL BUSINESS INFORMATION.pdf; Electrify America Comments on NJ BPU Straw Proposal 6-17-20 (002).pdf

Sarah,

Please accept my sincere thanks to you and your team for taking time to meet with us last week. As you requested, I have attached a copy of the presentation, which contains confidential business information and is therefore shared in confidence.

In addition, I have attached a recent filing that Electrify America made on demand charges in New Jersey, and below are links to each of the papers referenced during our discussion, or in the slides.

- **Slide 3:** Atlas Public Policy (2021): [U.S. Passenger Vehicle Electrification Infrastructure Assessment](#) (provides information on the cost effectiveness, and optimal nature of ultra-fast charging for long term light duty electrification)
- **Slide 4:** Great Plains Institute (2019): [Analytical White Paper: Overcoming Barriers to Expanding Fast Charging Infrastructure in the Midcontinent Region](#) (describes the enormous operations costs associated with demand charges at ultra-fast charging stations)
- **Slide 6:** NREL (2021): [There's No Place Like Home: Residential Parking, Electrical Access, and Implications for the Future of Electric Vehicle Charging Infrastructure](#) (notes that more than half of vehicles lack access to electricity for overnight parking and very few residents of apartment complexes have access to residential charging)
- **Slide 6:** Joint Center For Housing Studies of Harvard University (2018): [The State of the Nation's Housing; Bloomberg CityLab: Who Owns a Home in America, in 12 Charts](#) (indicates that individuals in condos/apartments and those who rent tend to be lower-income with significant disparities in race and ethnicity)
- **Slide 7:** Oak Ridge National Laboratory (2018): [Could a bioenergy program stimulate electric vehicle market penetration? Potential impacts of biogas to electricity annual rebate program](#) (projects that the eRIN program would result in deployment of 19.7 million additional EVs above baseline by 2030)
- **Slide 7:** DOE: [Biogas Opportunities Roadmap](#) (notes the methane emission reductions that would occur through heightened biogas capture)

We look forward to further conversations, and to that end, I would like to reiterate that we are happy to present this to others on your staff. Michael will of course follow up directly with Kyle to offer a briefing, as was suggested during the call, but we would also be happy to brief others at OTAQ if you suggest.

Research shows that eRINs would do more to enable attainment of President Biden's 2030 goals of 500,000 charging stations and 50% EV sales than any other policy under current law. Operating cost challenges threaten the charging industry's ability to sell its low carbon fuel for less than gasoline, but that is a problem the RFS was tailor designed to address. eRINs would help address that challenge, thereby serving as a companion operating cost strategy to the proposed \$7.5B capital investment in EV charging laid out in the Infrastructure Investment and Jobs Act. For these reasons, we encourage EPA to act on this opportunity with urgency.

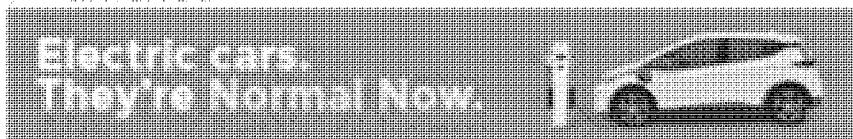
Please have a lovely weekend, and please view us as a resource as you consider a path forward on this very important opportunity.

Sincerely,

**Matthew B. Nelson**

Director of Government Affairs

Electrify America  
2003 Edmund Halley Drive  
2<sup>nd</sup> Floor, Suite 200  
Reston, VA 20191  
m: +1 (571) 352-8840  
[matthew.nelson@electrifyamerica.com](mailto:matthew.nelson@electrifyamerica.com)



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Appointment

---

**From:** Dunham, Sarah [Dunham.Sarah@epa.gov]  
**Sent:** 9/23/2021 3:33:48 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]; Charmley, William [charmley.william@epa.gov]; Machiele, Paul [machiele.paul@epa.gov]; Herbolsheimer, Courtney [herbolsheimer.courtney@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Chris Miller [cmiller@ajw-inc.com]  
**CC:** Kirkbride, Robin [Kirkbride.Robin@epa.gov]; Gonzalez, Gail [Gonzalez.Gail@epa.gov]  
**Subject:** CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

**Required Attendees:** William Charmley (charmley.william@epa.gov); Paul Machiele (machiele.paul@epa.gov); Herbolsheimer, Courtney; Hengst, Benjamin; Chris Miller  
**Optional Attendees:** robin kirkbride; Gail Gonzalez

---

## Microsoft Teams meeting

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Appointment

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**From:** Dunham, Sarah [Dunham.Sarah@epa.gov]  
**Sent:** 9/23/2021 3:33:48 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]; Charmley, William [charmley.william@epa.gov]; Machiele, Paul [machiele.paul@epa.gov]; Herbolsheimer, Courtney [herbolsheimer.courtney@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Chris Miller [cmiller@ajw-inc.com]  
**CC:** Kirkbride, Robin [kirkbride.robin@epa.gov]; Gonzalez, Gail [Gonzalez.Gail@epa.gov]; Noah Rothstein [noah@waxmanstrategies.com]; Poliakoff, Andrew [Andrew.Poliakoff@electrifyamerica.com]  
**Subject:** CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

**Required Attendees:** Dunham, Sarah; William Charmley (charmley.william@epa.gov); Paul Machiele (machiele.paul@epa.gov); Herbolsheimer, Courtney; Hengst, Benjamin; Chris Miller  
**Optional Attendees:** robin kirkbride; Gonzalez, Gail; Noah Rothstein; Poliakoff, Andrew

---

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Appointment

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**From:** Stewart, Gwen [Stewart.Gwen@epa.gov]  
**Sent:** 9/28/2021 2:55:21 PM  
**To:** Charmley, William [charmley.william@epa.gov]; Machiele, Paul [machiele.paul@epa.gov]; Herbolzheimer, Courtney [herbolzheimer.courtney@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Chris Miller [cmiller@ajw-inc.com]  
**CC:** Kirkbride, Robin [Kirkbride.Robin@epa.gov]; Gonzalez, Gail [Gonzalez.Gail@epa.gov]  
**Subject:** CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Tentative

**Required Attendees:** William Charmley (charmley.william@epa.gov); Paul Machiele (machiele.paul@epa.gov); Herbolzheimer, Courtney; Hengst, Benjamin; Chris Miller  
**Optional Attendees:** robin kirkbride; Gail Gonzalez

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Appointment

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**From:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]  
**Sent:** 3/30/2021 7:18:56 PM  
**To:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand [carrie@usabiomass.org]  
**Subject:** Meet with Biomass Power Association  
**Attachments:** Re: FW: Meeting Request: Electricity in the RFS; External meeting request\_.docx  
**Location:** Microsoft Teams Meeting  
**Start:** 4/13/2021 5:00:00 PM  
**End:** 4/13/2021 5:30:00 PM  
**Show Time As:** Tentative

**Required Attendees:** bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand; Dunham, Sarah; Hengst, Benjamin



Re: FW: Meeting Request: Electric...



External meeting request\_.docx

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## Microsoft Teams meeting

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Message

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**From:** Carrie Annand [carrie@usabiomass.org]  
**Sent:** 3/30/2021 2:54:45 PM  
**To:** Kabanda, Thierry [Kabanda.Thierry@epa.gov]  
**CC:** carrie@usabiomass.org; Campbell, Ann [Campbell.Ann@epa.gov]; Rakosnik, Delaney [rakosnik.delaney@epa.gov]; OAR Invitations [OAR\_Invitations@epa.gov]  
**Subject:** Re: FW: Meeting Request: Electricity in the RFS  
**Attachments:** External meeting request\_.docx

Thank you Thierry and team! Attached is the meeting request form filled out. Let me know if you have any additional questions for us.

Best,  
Carrie

On Mon, Mar 29, 2021 at 12:13 PM Kabanda, Thierry <Kabanda.Thierry@epa.gov> wrote:

Good afternoon Carrie,

Please see attached meeting request form. If you can please fill out and return to us, we'll be glad to coordinate this meeting. Thanks!

---

**From:** Campbell, Ann <Campbell.Ann@epa.gov>  
**Sent:** Monday, March 29, 2021 11:52 AM  
**To:** Kabanda, Thierry <Kabanda.Thierry@epa.gov>  
**Cc:** Rakosnik, Delaney <rakosnik.delaney@epa.gov>  
**Subject:** FW: Meeting Request: Electricity in the RFS

Please vet and respond. Thank you.

Ann (Campbell) Ferrio  
Chief of Staff  
EPA/Office of Air and Radiation  
Office: 202 566 1370

---

**From:** Carrie Annand <carrie@usabiomass.org>  
**Sent:** Monday, March 29, 2021 11:48 AM  
**To:** Goffman, Joseph <Goffman.Joseph@epa.gov>; Campbell, Ann <Campbell.Ann@epa.gov>  
**Cc:** Bob Cleaves <bob@usabiomass.org>; Paul Argyropoulos <policynexusadvisors@gmail.com>; Soos, Paula <PSoos@covanta.com>; Patrick Serfass <pserfass@ttcorp.com>  
**Subject:** Meeting Request: Electricity in the RFS

Dear Deputy Principal Assistant Administrator Goffman (Joe),

The members of the RFS Power Coalition - Biomass Power Association, American Biogas Council and

Energy Recovery Council – request the opportunity to meet with you at your earliest availability. We'd be happy to host a meeting with our group over Zoom or another video meeting platform that works for you. Our members generate electricity from RFS-qualifying feedstocks and as you are probably aware, we have been working for a number of years to get both existing and new qualifying pathways and facilities authorized to generate RINs under the program. We greatly appreciate any time available for us to present more details about our coalition and to provide additional information to assist the Agency moving forward with these issues. (Additional Background available on our website at [www.rfspower.com](http://www.rfspower.com)).

We recently met with Director Dunham and her OTAQ colleagues to discuss how to incorporate approved and future electricity pathways into the RFS program. We feel that implementing the electricity program in the RFS aligns well with the Biden Administration's climate goals. We were encouraged by our meeting with OTAQ staff and look forward to meeting with you to learn about your plans and see how we can best assist in expediting this effort.

Do you have some time next week or the following week for a meeting?

Thanks very much.

Best,

Carrie Annand

--

Carrie Annand

Executive Director

**Biomass Power Association**

Mobile: (202) 494-2493

601 New Jersey Ave. NW, Suite 660 / Washington, DC / 20001

Twitter: [@USABiomass](https://twitter.com/USABiomass)

[www.usabiomass.org](http://www.usabiomass.org)

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## [ SEQ CHAPTER \h \r 1]External Meeting Request Form for OAR

Today's Date: March 29, 2021

Requesting Organization: RFS Power Coalition (composed of American Biogas Council, Biomass Power Association, Energy Recovery Council)

Title of the Meeting: eRINs in the RFS

Purpose: To discuss the implementation of electricity produced from RFS-qualifying feedstocks in the Renewable Fuel Standard

Background: The members of the RFS Power Coalition - Biomass Power Association, American Biogas Council and Energy Recovery Council - request the opportunity to meet with you at your earliest availability. We'd be happy to host a meeting with our group over Zoom or another video meeting platform that works for you. Our members generate electricity from RFS-qualifying feedstocks and as you are probably aware, we have been working for a number of years to get both existing and new qualifying pathways and facilities authorized to generate RINs under the program. We greatly appreciate any time available for us to present more details about our coalition and to provide additional information to assist the Agency moving forward with these issues. (Additional Background available on our website at [ HYPERLINK "http://www.rfspower.com/" \t "\_blank" ]).

We recently met with Director Dunham and her OTAQ colleagues to discuss how to incorporate approved and future electricity pathways into the RFS program. We feel that implementing the electricity program in the RFS aligns well with the Biden Administration's climate goals. We were encouraged by our meeting with OTAQ staff and look forward to meeting with you to learn about your plans and see how we can best assist in expediting this effort.

Is this meeting related to ongoing litigation: The DC Circuit Court of Appeals is reviewing our challenge of the 2019 Renewable Volume Obligation due to its lack of electricity. We are awaiting the decision, and the litigation is not the focus of this meeting, but we are willing to discuss a settlement with EPA.

Earliest possible date for the meeting: April 5, 2021

Last possible date for the meeting:

Is the meeting urgent and if so, why: We are hoping that the upcoming 2021/2022 RVO will include electricity volumes. It is a matter of urgency for many of our respective members who have been waiting to participate in the RFS for seven years or longer.

Requested Time Length: One hour

Have you met with anyone within EPA: Yes, OTAQ Director Sarah Dunham and her team

Invitees: Principal Deputy Assistant Administrator Goffman and anyone else he'd like present

External Participants (to include email addresses):

Bob Cleaves, Biomass Power Association [ [HYPERLINK "mailto:bob@usabiomass.org" \]](mailto:bob@usabiomass.org) ]

Paula Soos, Covanta [ [HYPERLINK "mailto:psoos@covanta.com" \]](mailto:psoos@covanta.com) ]

Patrick Serfass, American Biogas Council [ [HYPERLINK "mailto:pserfass@ttcorp.com" \]](mailto:pserfass@ttcorp.com) ]

Michael Goo on behalf of Electrify America [ [HYPERLINK "mailto:mgoo@waxmanstrategies.com" \]](mailto:mgoo@waxmanstrategies.com) ]

Teleconference Required:

Video Conference Required: We'd prefer video conference if possible.

Point of Contact for the Meeting: Carrie Annand, Biomass Power Association 202-494-2493 / [ [HYPERLINK "mailto:carrie@usabiomass.org" \]](mailto:carrie@usabiomass.org) ]

\*\*\*Please email this form back to [OAR\\_Invitations@epa.gov](mailto:OAR_Invitations@epa.gov)\*\*\*

Appointment

---

**From:** Noah Rothstein [noah@waxmanstrategies.com]  
**Sent:** 9/28/2021 2:59:26 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]

**Subject:** Accepted: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting

**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

**Recurrence:** (none)

Appointment

---

**From:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]  
**Sent:** 3/30/2021 7:18:56 PM  
**To:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand [carrie@usabiomass.org]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]  
**Subject:** Meet with Biomass Power Association  
**Attachments:** Re: FW: Meeting Request: Electricity in the RFS; External meeting request\_.docx  
**Location:** Microsoft Teams Meeting  
**Start:** 4/13/2021 5:00:00 PM  
**End:** 4/13/2021 5:30:00 PM  
**Show Time As:** Tentative

**Required Attendees:** bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand; Dunham, Sarah; Hengst, Benjamin



Re: FW: Meeting Request: Electric...



External meeting request\_.docx

---

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Message

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**From:** Dunham, Sarah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A9444681441E4521AD92AE7D42919223-SDUNHAM]  
**Sent:** 9/22/2021 8:29:01 PM  
**To:** Chris Miller [cmiller@ajw-inc.com]  
**CC:** Gwen Stewart [stewart.gwen@epa.gov]  
**Subject:** RE: ERINs & Electrify America - mtg request

Hi Chris-

I'm adding Gwen, and taking Delaney off. I'm happy to find a time as soon as we can. Gwen can help suggest some times.

Thanks

Sarah

---

**From:** Chris Miller <cmiller@ajw-inc.com>  
**Sent:** Wednesday, September 22, 2021 4:03 PM  
**To:** Rakosnik, Delaney <rakosnik.delaney@epa.gov>; Dunham, Sarah <Dunham.Sarah@epa.gov>  
**Subject:** Re: ERINs & Electrify America - mtg request

Thanks Delaney. Hi Sarah - does any time soon work for your calendar? as you won't be surprised, they're anxious to have the meeting.

Best, Chris

---

**From:** Rakosnik, Delaney <rakosnik.delaney@epa.gov>  
**Sent:** Wednesday, September 22, 2021 3:59 PM  
**To:** Chris Miller <cmiller@ajw-inc.com>  
**Cc:** Dunham, Sarah <Dunham.Sarah@epa.gov>  
**Subject:** RE: ERINs & Electrify America - mtg request

Hi Chris,

Many apologies for the delay; We were identifying the most appropriate person to take this meeting. Please contact Sarah Dunham (cc'd) to schedule a meeting on ERINs & Electrify America. She's wonderful and you should have an excellent meeting.

Many thanks!

Delaney Rakosnik  
Staff Assistant  
Immediate Office of the Assistant Administrator  
Office of Air and Radiation, USEPA  
Room 5406A, 1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Voice: 202-564-0935  
Email: [rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)



---

Many ap9**From:** Chris Miller <[cmiller@ajw-inc.com](mailto:cmiller@ajw-inc.com)>  
**Sent:** Monday, September 20, 2021 5:40 PM  
**To:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Subject:** Re: ERINs & Electrify America - mtg request

thank you

---

**From:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Sent:** Monday, September 20, 2021 5:22 PM  
**To:** Chris Miller <[cmiller@ajw-inc.com](mailto:cmiller@ajw-inc.com)>  
**Subject:** RE: ERINs & Electrify America - mtg request

It's in the queue. We should have an answer very (very) soon. So sorry for the delay.

---

**From:** Chris Miller <[cmiller@ajw-inc.com](mailto:cmiller@ajw-inc.com)>  
**Sent:** Thursday, September 16, 2021 10:23 AM  
**To:** Rakosnik, Delaney <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Subject:** Fw: ERINs & Electrify America - mtg request

Hi Delaney - just checking to see if this is in the meeting request queue.

Thanks, Chris

---

**From:** Chris Miller  
**Sent:** Thursday, September 2, 2021 10:39 AM  
**To:** Jo Goffman <[goffman.joseph@epa.gov](mailto:goffman.joseph@epa.gov)>  
**Cc:** Delaney Rakosnik <[rakosnik.delaney@epa.gov](mailto:rakosnik.delaney@epa.gov)>  
**Subject:** ERINs & Electrify America - mtg request

Hi Joe - thanks very much for the time and conversation on the future of fuels/LCFS. I hope you saw the letter to Admin Regan that I sent subsequently.

In a semi-related request, our client Electrify America would very much like to meet with you to talk ERINs and to give you a very brief download on what EPA policy can/will do for buildout of EV charging infrastructure.

Thanks,  
Chris

2022578691

Appointment

---

**From:** Microsoft Outlook [MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@usepa.onmicrosoft.com]  
**Sent:** 9/28/2021 2:55:22 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]  
**Subject:** Meeting Forward Notification: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM

**Recurrence:** (none)

**Your meeting was forwarded**

Stewart, Gwen has forwarded your meeting request to additional recipients.

**Meeting**

CONFIRMED: eRINS and Electrify America

**Meeting Time**

Thursday, October 7, 2021 11:00 AM-11:45 AM.

**Recipients**

Charmley, William

Machiele, Paul

Herbolsheimer, Courtney

Hengst, Benjamin

Chris Miller

Kirkbride, Robin

Gonzalez, Gail

All times listed are in the following time zone: (UTC-05:00) Eastern Time (US & Canada)

---

Sent by Microsoft Exchange Server

Message

---

**From:** Carrie Annand [carrie@usabiomass.org]  
**Sent:** 10/19/2021 2:26:34 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]  
**CC:** Bob Cleaves [bob@usabiomass.org]; Patrick Serfass [pserfass@ttcorp.com]; Ted Michaels [TMichaels@ajw-inc.com]; Paul Argyropoulos [policynexusadvisors@gmail.com]  
**Subject:** RFS Power Coalition - Offer of Assistance on eRINs Action

Sarah and Ben, we hope all is well with you. We at RFS Power Coalition have heard that EPA is actively working to address eRINs. We are very excited about this development and, as you work on this initiative, we wanted to renew our offer to provide feedback or answer any questions you have about biomass, biogas and waste-to-energy power production.

We look forward to hearing more and being of assistance however we can.

Best,  
Carrie Annand

On Wed, Aug 18, 2021 at 9:57 AM Carrie Annand <carrie@usabiomass.org> wrote:

Sarah and Ben, thanks again for meeting with the RFS Power Coalition last week. We appreciated the time you and Acting Assistant Administrator Goffman spent with us, and we look forward to working with you as you continue to decide how to implement the electricity portion of the RFS.

Attached is a letter thanking you and offering our assistance. Please don't hesitate to reach out to us for any reason.

Best regards,  
Carrie Annand

--

**Carrie Annand**  
Executive Director  
**Biomass Power Association**

Mobile: (202) 494-2493  
601 New Jersey Ave. NW, Suite 660 / Washington, DC / 20001  
Twitter: [@USABiomass](https://twitter.com/USABiomass)  
[www.usabiomass.org](http://www.usabiomass.org)

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Message

---

**From:** Chris Hessler [CHessler@ajw-inc.com]  
**Sent:** 1/19/2022 5:03:33 PM  
**To:** Goffman, Joseph [Goffman.Joseph@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]  
**CC:** Rakosnik, Delaney [rakosnik.delaney@epa.gov]; Brian Foody (brian.foody@iogen.ca) [brian.foody@iogen.ca]; Kathy Kiely [kKiely@ajw-inc.com]  
**Subject:** For Tomorrow's discussion  
**Attachments:** ATT00001.txt; 220118 MCF the RFS2\_FINAL.docx

Joe, Ale, and Sarah,  
Attached is a document that might be helpful in guiding our discussion tomorrow.  
Looking forward to our discussion.  
H



**Christopher Hessler | Founding Partner**  
2101 Wilson Blvd, Suite 530, Arlington, VA 22201  
M: 202.460.0945  
[chessler@ajw-inc.com](mailto:chessler@ajw-inc.com)  
[www.ajw-inc.com](http://www.ajw-inc.com)

Appointment

---

**From:** Rakosnik, Delaney [rakosnik.delaney@epa.gov]  
**Sent:** 1/19/2022 9:48:25 PM  
**To:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Li, Ryland (Shengzhi) [Li.Ryland@epa.gov]; Burkholder, Dallas [burkholder.dallas@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Machiele, Paul [machiele.paul@epa.gov]; Chris Hessler [CHessler@ajw-inc.com]  
**CC:** Brian Foody [brian.foody@IOGEN.ca]; Dubey, Susmita [dubey.susmita@epa.gov]  
**Subject:** Meeting with AJW, INC re: Using the RFS to Accelerate Fuel Decarbonization  
**Attachments:** 2022 Goffman meeting request\_ AJW & logen.docx; 2022 Goffman meeting request\_ AJW & logen.docx; 220118 MCF the RFS2\_FINAL.docx  
**Location:** Microsoft Teams Meeting  
**Start:** 1/20/2022 10:00:00 PM  
**End:** 1/20/2022 10:30:00 PM  
**Show Time As:** Tentative

**Required Attendees:** Nunez, Alejandra; Hengst, Benjamin; Li, Ryland (Shengzhi); Burkholder, Dallas; Dunham, Sarah; Machiele, Paul; Chris Hessler  
**Optional Attendees:** Brian Foody; Dubey, Susmita



---

## Microsoft Teams meeting

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**Or call in (audio only)**  
**Ex. 6 Personal Privacy (PP)** United States, Washington DC

Phone Conference ID: **Ex. 6 Personal Privacy (PP)**  
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[ SEQ CHAPTER \h \r 1] *External Meeting Request Form for  
Joe Goffman*

Today's Date: January 12, 2022

Requesting Organization: AJW, Inc.

Title of the Meeting: Using the RFS to Accelerate Fuel Decarbonization

Purpose: To discuss opportunities for using existing EPA authorities to increase investor confidence in market demand for low carbon fuels.

Background:

- Using Cellulosic RIN "Carryover" strategies (on which EPA requested comment in the NPRM) could largely eliminate demand uncertainties and EPA's market projection risks
- Using the "Set" rule, EPA could establish realistic cellulosic targets to support achievement of the Biden Administration's decarbonization targets
- Adding resources to evaluate and respond to RFS Pathway applications would expand cellulosic biofuel production

Is this meeting related to ongoing litigation:

logen, Corporation is a petitioner in case No. 20-1046 (and consolidated cases) pending before the United States Court of Appeals for the District of Columbia Circuit. This meeting is not intended to be a discussion of that or any litigation.

Earliest possible date for the meeting: asap

Last possible date for the meeting: NA

Is the meeting urgent and if so, why: The meeting is intended to support EPA's internal deliberations related to the upcoming regulatory actions.

Requested Time Length: 1 hour

Have you met with anyone within EPA: OTAQ staff

Invitees:

External Participants:

- Christopher Hessler, AJW, Inc.
- Brian Foody, logen

Teleconference Required: Yes

Video Conference Required: Preferred

Point of Contact for the Meeting: Christopher Hessler

\*\*\*Please email this form back to [OAR\\_Invitations@epa.gov](mailto:OAR_Invitations@epa.gov)\*\*\*



*[ SEQ CHAPTER \h \r 1]External Meeting Request Form for  
Joe Goffman*

Today's Date: January 12, 2022

Requesting Organization: AJW, Inc.

Title of the Meeting: Using the RFS to Accelerate Fuel Decarbonization

Purpose: To discuss opportunities for using existing EPA authorities to increase investor confidence in market demand for low carbon fuels.

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Iogen, Corporation is a petitioner in case No. 20-1046 (and consolidated cases) pending before the United States Court of Appeals for the District of Columbia Circuit. This meeting is not intended to be a discussion of that or any litigation.

Earliest possible date for the meeting: asap

Last possible date for the meeting: NA

Is the meeting urgent and if so, why: The meeting is intended to support EPA's internal deliberations related to the upcoming regulatory actions.

Requested Time Length: 1 hour

Have you met with anyone within EPA: OTAQ staff

Invitees:

External Participants:

- Christopher Hessler, AJW, Inc.
- Brian Foody, Iogen

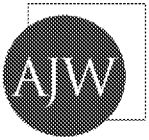
Teleconference Required: Yes



Video Conference Required: Preferred

Point of Contact for the Meeting: Christopher Hessler

\*\*\*Please email this form back to [OAR\\_Invitations@epa.gov](mailto:OAR_Invitations@epa.gov)\*\*\*



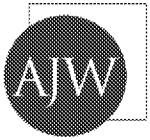
## USING THE RFS TO ACHIEVE DECARBONIZATION GOALS

<p><b>OBJECTIVES</b></p>	<p>To make a major contribution to the Administration’s 2030 climate change objectives by driving the growth of low carbon fuel consumption:</p> <ul style="list-style-type: none"> <li>• with a multi-year RFS volume mandate aligned with the Administration’s climate change goals; and</li> <li>• stable consistent market signals from the RFS encouraging the deployment of low carbon fuels</li> </ul>
<p><b>STRATEGY</b></p>	<p>Utilize existing RFS authorities to create predictable, long-term market demand for cellulosic production without stretching beyond the text of the legislation.</p> <ol style="list-style-type: none"> <li>1. Adopt a D3 RIN Carryover approach discussed in the NPRM as part of the final RVO rule</li> <li>2. Increase resources to expand available pathways – prioritizing pathway review according to the decarbonization potential of the proposed pathway</li> <li>3. Use the “set” rule to establish a long-term cellulosic production target that supports realization of the Administration’s decarbonization goals</li> </ol>
<p><b>BENEFIT</b></p>	<p>These three steps taken as soon as reasonably practical would maximize the use of existing Executive authority to encourage investment and scale-up of the lowest carbon fuels, including sustainable aviation fuel, clean hydrogen, other hydrogen-based fuels and EVs.</p>

### DISCUSSION

Set a path for cellulosic biofuel volumes through 2030 based on the assumption that the Administration’s climate change objectives can and will be met.

Cellulosic RVO’s should not assume the Administration’s own targets are unrealistic or set the RFS on a path that abandons the Administration’s climate change objectives. EPA should be able to achieve this while also using realistic production projections that reasonably ensure EPA will not need to issue waivers in the future.



# 1. EXPLANATION OF THE CELLULOSIC RIN CARRYOVER

## HOW A CELLULOSIC RIN CARRYOVER COULD WORK

- A = Anticipated cellulosic RIN production during the calendar year
- B = Plus any available surplus in cellulosic RINs carried over from the prior year
- C = Minus any RIN deficits carried-forward from the prior year – which obligated parties would be permitted carry forward on a *pro rata* basis when there is a shortfall in cellulosic RIN availability

A = (Calendar year D3 RIN Production)	100	100	100
B = (RINs available from prior year)	+10	+0	+0
C = (RINs needed to meet deficits carried forward from prior year)	-0	-10	-0
<b>Basis for Calendar Year RVO</b>	<b>110</b>	<b>90</b>	<b>100</b>

## BENEFITS OF A CELLULOSIC RIN CARRYOVER

- Ensures all cellulosic RINs produced will be in demand in the market – creating a strong and stable price with forward confidence
- Ensures that production shortfalls compared with RVO do not necessitate widespread use of cellulosic waiver credits
- Reduces the risks for cellulosic producers, obligated parties, and all other market participants of inaccurate EPA projections for cellulosic RIN production

## EPA'S OWN WORDS SUGGEST THAT A CELLULOSIC RIN CARRYOVER WOULD...

**Be consistent with the law...**

It is consistent with the law to read “**volume available**” for cellulosic RVOs as available cellulosic RINs, not fuel production in a given year:

*“The court further held that EPA’s methodology for making its cellulosic biofuel projection must take a “neutral aim at accuracy.” Thus, the projected **volume** of cellulosic biofuel **available** in a given year should reflect the volume [of cellulosic RINs] that can actually be used to satisfy obligated parties’ renewable volume obligations. Obligated parties demonstrate compliance via the procurement and retirement of RINs...” [not procurement of fuels]*

Draft RIA 5.1.3 | Emphasis added where language mirrors CAA Sec. 211 (o)(7)(D)(i)

---

**Promote a clear market signal...**

*“Adopting the cellulosic RIN carryover approach “would likely result in [a stable cellulosic RIN price]”*

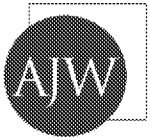
ANPRM section (IV)(A)(3)

---

**Create value for cellulosic RIN producers and investors...**

*“A significant portion of the [cellulosic] RIN value may remain with the biofuel producer, parties that dispense LNG/CNG, and any other parties involved in the generation of this type of cellulosic biofuel.”*

Draft RIA 1.9.2



## 2. ACCELERATED AND PRIORITIZED PATHWAY PROCESS

By increasing the market access for innovative transportation fuels that can meet the cellulosic criteria (e.g. clean hydrogen incorporated in conventional diesel and gasoline, eRINs, etc.), EPA increases the:

- volume of low carbon fuels available to displace more carbon intensive fuels;
- Strength of the investment signal for innovation in fuels; and
- optionality for meeting Administration decarbonization targets

## 3. THE “SET” RULE SHOULD REFLECT ADMINISTRATION DECARBONIZATION TARGETS

Cellulosic targets established under the RFS are the only clear authority in law for the Administration to address the carbon intensity of fuels.

- The Administration has set aggressive but achievable decarbonization targets
- Low carbon fuels can support achieving near-term targets
- Low carbon fuels are essential for addressing long term hard-to-decarbonize sectors

Appointment

---

**From:** Poliakoff, Andrew [Andrew.Poliakoff@electrifyamerica.com]  
**Sent:** 9/28/2021 2:59:44 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]

**Subject:** Accepted: [From: External] Fw: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting

**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

**Recurrence:** (none)

Appointment

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**From:** Haley Armstrong [harmstrong@ajw-inc.com]  
**Sent:** 9/29/2021 3:24:34 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]  
**Subject:** Accepted: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

Appointment

---

**From:** Chris Miller [cmiller@ajw-inc.com]  
**Sent:** 10/5/2021 2:54:01 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]

**Subject:** Accepted: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting

**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

**Recurrence:** (none)

Appointment

---

**From:** Nelson, Matthew [Matthew.Nelson@electrifyamerica.com]  
**Sent:** 10/5/2021 5:34:15 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]  
**Subject:** Accepted: [From: External] FW: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy  
  
**Recurrence:** (none)



Appointment

---

**From:** Dick, Andrew [Andrew.Dick@electrifyamerica.com]  
**Sent:** 10/6/2021 7:14:36 PM  
**To:** Dunham, Sarah [Dunham.Sarah@epa.gov]  
  
**Subject:** Accepted: FW: CONFIRMED: eRINS and Electrify America  
**Location:** Microsoft Teams Meeting  
  
**Start:** 10/7/2021 3:00:00 PM  
**End:** 10/7/2021 3:45:00 PM  
**Show Time As:** Busy

Message

---

**From:** Chris Miller [cmiller@ajw-inc.com]  
**Sent:** 1/27/2021 2:25:24 PM  
**To:** Joseph Goffman (Goffman.Joseph@epamail.epa.gov) [goffman.joseph@epamail.epa.gov]; Goffman, Joseph [Goffman.Joseph@epa.gov]  
**Subject:** ERINS & LCFS

Good morning sir - happy climate day! (or should that be year(s)?)

if you have 10-15 minutes sometime soon for an unofficial groundtruthing conversation, i'd love to tell you where we are in our efforts to build a coalition to support legislating or regulating an lcfs. i aspire to have this project well-coordinated with your/Admin priorities.

AND, to get any guidance to help level set our multiple clients' expectations about what is possible on ERINS... though early action seems desirable to get the ev crediting system/structure set up rapidly to make the lcfs more workable and implementable.

thanks, Chris  
202-257-8691

**Christopher Miller, Partner**  
AJW, Inc.  
2200 Wilson Blvd, Suite 310  
Arlington, VA 22201-3352  
202-257-8691 cell

Appointment

**From:** Rakosnik, Delaney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=274573739a9f446883072599086ededd-Rakosnik, D]  
**Sent:** 1/12/2022 6:38:28 PM  
**To:** Goffman, Joseph [Goffman.Joseph@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Li, Ryland (Shengzhi) [Li.Ryland@epa.gov]; Burkholder, Dallas [burkholder.dallas@epa.gov]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Machiele, Paul [Machiele.Paul@epa.gov]; Chris Hessler [CHessler@ajw-inc.com]  
**CC:** Brian Foody [brian.foody@IOGEN.ca]; Dubey, Susmita [dubey.susmita@epa.gov]  
**Subject:** Meeting with AJW, INC re: Using the RFS to Accelerate Fuel Decarbonization  
**Attachments:** 2022 Goffman meeting request\_ AJW & logen.docx; 2022 Goffman meeting request\_ AJW & logen.docx; 220118 MCF the RFS2\_FINAL.docx  
**Location:** Microsoft Teams Meeting  
**Start:** 1/20/2022 10:00:00 PM  
**End:** 1/20/2022 10:30:00 PM  
**Show Time As:** Busy

**Required Attendees:** Nunez, Alejandra; Hengst, Benjamin; Li, Ryland (Shengzhi); Burkholder, Dallas; Dunham, Sarah; Machiele, Paul; Chris Hessler  
**Optional Attendees:** Brian Foody; Dubey, Susmita



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[Alternate VTC instructions](#)

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Ex. 6 Personal Privacy (PP) United States, Washington DC

Phone Conference ID: Ex. 6 Personal Privacy (PP)

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**From:** Goffman, Joseph [Goffman.Joseph@epa.gov]  
**Sent:** 2/22/2021 12:51:33 PM  
**To:** Goffman, Joseph [Goffman.Joseph@epa.gov]; Chris Miller [cmiller@ajw-inc.com]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]; Nunez, Alejandra [Nunez.Alejandra@epa.gov]  
**CC:** Kim, Eun [Kim.Eun@epa.gov]  
**Subject:** Meeting with Chris Miller re: ERINS & LCFS  
**Location:** Microsoft Teams Meeting  
**Start:** 2/22/2021 9:30:00 PM  
**End:** 2/22/2021 10:00:00 PM  
**Show Time As:** Busy

**Required Attendees:** Chris Miller; 'Dunham, Sarah (Dunham.Sarah@epa.gov)'; Benjamin Hengst; Nunez, Alejandra  
**Optional Attendees:** Kim, Eun

---

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Message

---

**From:** Chris Hessler [CHessler@ajw-inc.com]  
**Sent:** 8/4/2021 11:34:34 PM  
**To:** Simon, Karl [Simon.Karl@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]  
**CC:** Michael Goo [mgoo@waxmanstrategies.com]; Haley Armstrong [harmstrong@ajw-inc.com]  
**Subject:** Meeting Request re: eRINs  
**Attachments:** ATT00001.txt

Karl & Ben –

**First** – congratulations on getting to the eve of the WH event for the LD rule. One imagines that was a fun little cakewalk for you.

Good luck with the rollout, and hopefully everyone praises your good work, just like always happens when EPA proposes rules.

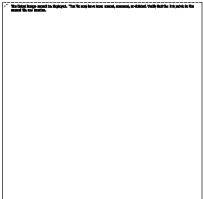
**Second**, next week, or as soon as you have a chance to catch your breath, could you please find 30 minutes to discuss the regulatory process and approach on eRINs?

To spoil any surprise, we have 2 areas of interest to explore with you:

1. How can our teams/clients be helpful working with EPA and stakeholders to ensure that the rule process moves as swiftly as possible?
2. What approaches might be most viable for ensuring that EPA's approach to eRINs maximizes market pull for expanding charging infrastructure?

Let me know when we might find time for a call.

H



**Christopher Hessler | Partner | AJW, Inc.**  
2200 Wilson Blvd, Suite 310, Arlington, VA 22201  
M: 202.460.0945  
[chessler@ajw-inc.com](mailto:chessler@ajw-inc.com)  
[www.ajw-inc.com](http://www.ajw-inc.com)

Appointment

---

**From:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]  
**Sent:** 4/9/2021 6:08:27 PM  
**To:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand [carrie@usabiomass.org]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]  
**CC:** Machiele, Paul [machiele.paul@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]  
**Subject:** Meet with Biomass Power Association  
**Attachments:** Re: FW: Meeting Request: Electricity in the RFS; External meeting request\_.docx  
**Location:** Microsoft Teams Meeting  
**Start:** 4/13/2021 5:00:00 PM  
**End:** 4/13/2021 5:30:00 PM  
**Show Time As:** Busy

**Required Attendees:** Nunez, Alejandra; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand; Dunham, Sarah; Hengst, Benjamin  
**Optional Attendees:** Paul Machiele (machiele.paul@epa.gov); Greenglass, Nora

-----Original Appointment-----

**From:** Nunez, Alejandra <Nunez.Alejandra@epa.gov>  
**Sent:** Tuesday, March 30, 2021 3:19 PM  
**To:** Nunez, Alejandra; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand; Dunham, Sarah; Hengst, Benjamin  
**Subject:** Meet with Biomass Power Association  
**When:** Tuesday, April 13, 2021 1:00 PM-1:30 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** Microsoft Teams Meeting



Re: FW: Meeting Request: Electric...



External meeting request\_.docx

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**From:** American Biogas Council [info@americanbiogascouncil.org]  
**Sent:** 11/9/2021 8:48:35 PM  
**To:** Mroz, Jessica [mroz.jessica@epa.gov]  
**Subject:** Press Release: RFS Power Coalition Commends Rep. John Garamendi for Introducing Bill Requiring EPA Action on eRINs



**FOR IMMEDIATE RELEASE**  
**November 9, 2021**

## **RFS Power Coalition Commends Rep. John Garamendi for Introducing Bill Requiring EPA Action on eRINs**

**WASHINGTON, D.C.** – The RFS Power Coalition today commended Rep. John Garamendi (D-CA) for introducing [H.R. 5899, the “Biomass and Biogas for Electric Vehicles Act”](#) late last week. If passed, this bill will require the U.S. Environmental Protection Agency (EPA) to finally process the outstanding project and pathway applications for the Renewable Fuel Standard (RFS) which have been waiting for EPA’s action for many years. The bill will finally allow biogas, biomass, and waste to energy projects to generate credits when they fuel hydrogen fuel cell electric vehicles or charge battery electric vehicles.

“I have long supported a utility-scale subsidy for biomass electricity to incentivize proper forest management and much-needed hazardous fuels reduction in fire-prone states like California. As California and neighboring states face increasingly severe and year-round fire seasons, this will help to reduce the artificially high levels of biomass on our forestlands due to man-made climate change, drought, invasive species like bark beetle outbreaks, and years of mismanagement,” said **Congressman Garamendi (D-CA)** in a press release announcing the bill. “Renewable electricity from biomass and biogas helps reduce our nation’s greenhouse gas emission and transition to a clean energy economy. While these measures alone will not solve the



climate crisis or prevent all catastrophic wildfires, they are undoubtedly part of the solution. That's why I'm introducing the 'Biomass and Biogas for Electric Vehicles Act.'"

"We greatly appreciate Rep. Garamendi for his focused attention on getting the EPA to implement the electricity program in the RFS," said Carrie Annand, executive director of Biomass Power Association. "The members of the RFS Power Coalition are power producers who use farm, forest and municipal solid waste – all qualifying feedstocks under the RFS – to supply power to electric vehicles, and they deserve credit for this contribution. Participation in the RFS represents stability for many of our members, as well as a reliable low-carbon fuel source for our nation's growing electric vehicle fleet."

"Thanks to Rep. Garamendi for the timely release of this bill, which requires the EPA to process applications from biogas power producers that have been pending since 2015," said Patrick Serfass, executive director of the American Biogas Council. "If we want to decarbonize transportation while creating a host of other economic and environmental benefits, biogas has to be a part of the solution. We look forward to working with Rep. Garamendi, and we urge Congress to pass this bill as soon as possible."

The introduction of this bill follows closely President Biden's recognition of renewable energy as a "valuable" forest product, and commitment to policies that will support the use of "wood waste materials to produce advanced biofuels, biochar, heat and power." These statements were made in President Biden's proclamation recognizing National Forest Products Week.

###

Click [here](#) for a pdf of this release.

**Media Contact:**

Maureen Walsh

202.681.6092

[maureen@dc-groupllc.com](mailto:maureen@dc-groupllc.com)

—

**About the RFS Power Coalition**

The RFS Power Coalition is a group of organizations dedicated to activating the renewable electricity pathway of the Renewable Fuel Standard (RFS). The Coalition is led by the [Biomass Power Association](#), [American Biogas Council](#) and [Energy Recovery Council](#), the trade associations that represent, respectively, domestic biomass power producers who use organic fuels like forest residues, biogas-to-electricity producers like dairy farmers and wastewater treatment facilities, and waste-to-energy producers. All three fuels – biomass, biogas and biogenic waste – qualify as renewable transportation fuels that should be included in the D3 cellulosic and D5 advanced fuel categories of the RFS. <https://rfspower.com>



—

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**From:** American Biogas Council [info@americanbiogascouncil.org]  
**Sent:** 1/13/2022 2:05:36 PM  
**To:** Mroz, Jessica [mroz.jessica@epa.gov]  
**Subject:** Program Topics Announced | BIOGAS AMERICAS | May 2022, Las Vegas



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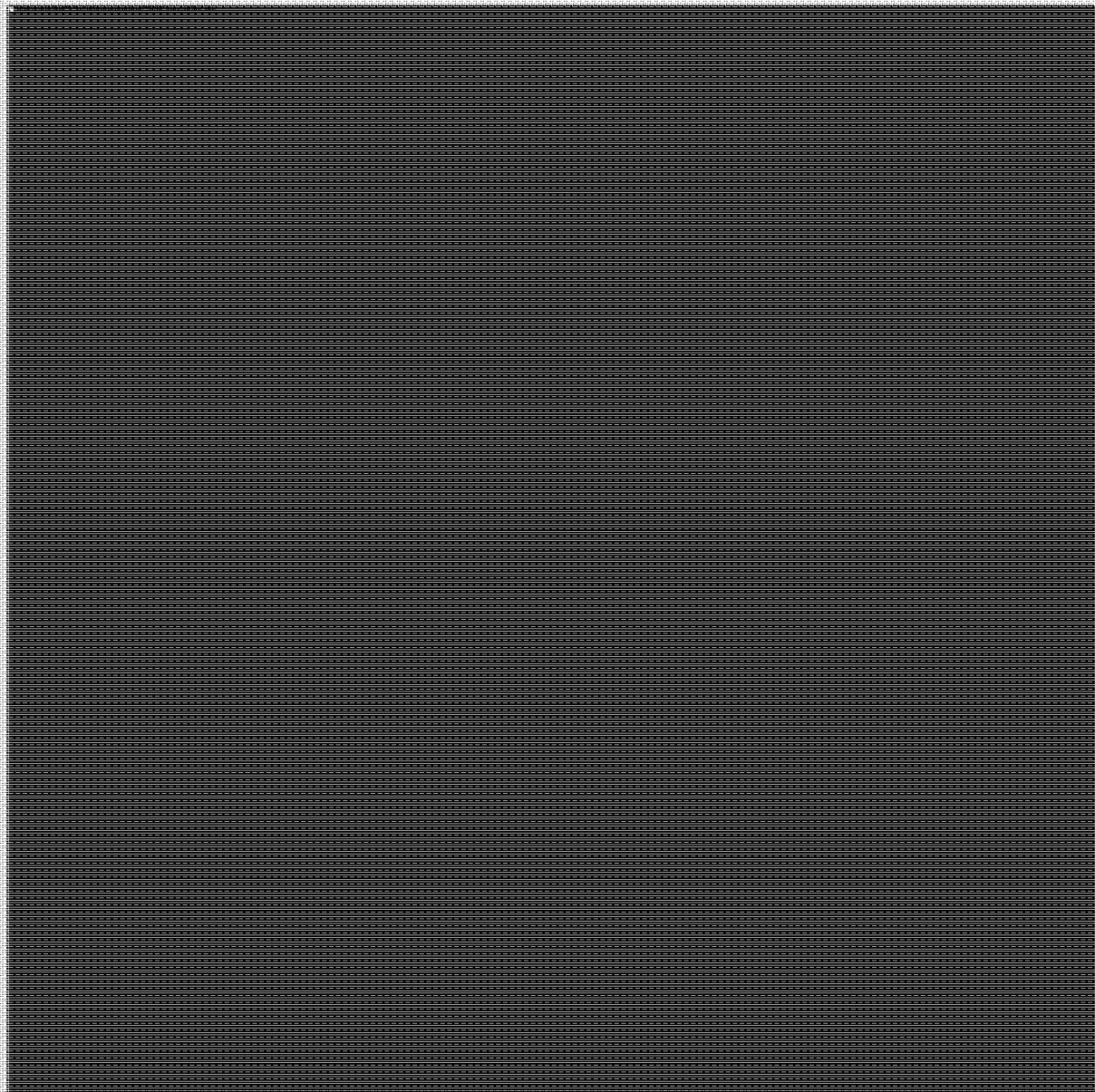
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NOTE: Early bird rates expire this month. So register today for the conference & expo, Biogas Golf Open, Industry Awards Dinner, Operator School and more! See the schedule at-a-glance [here](#).

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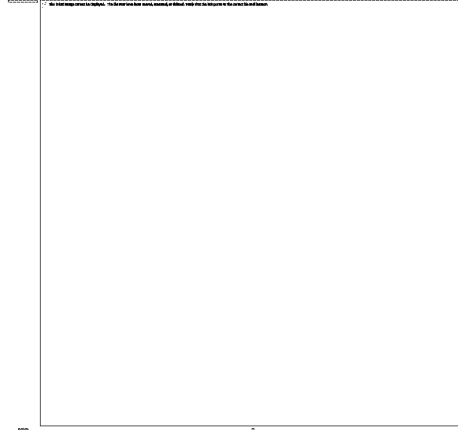
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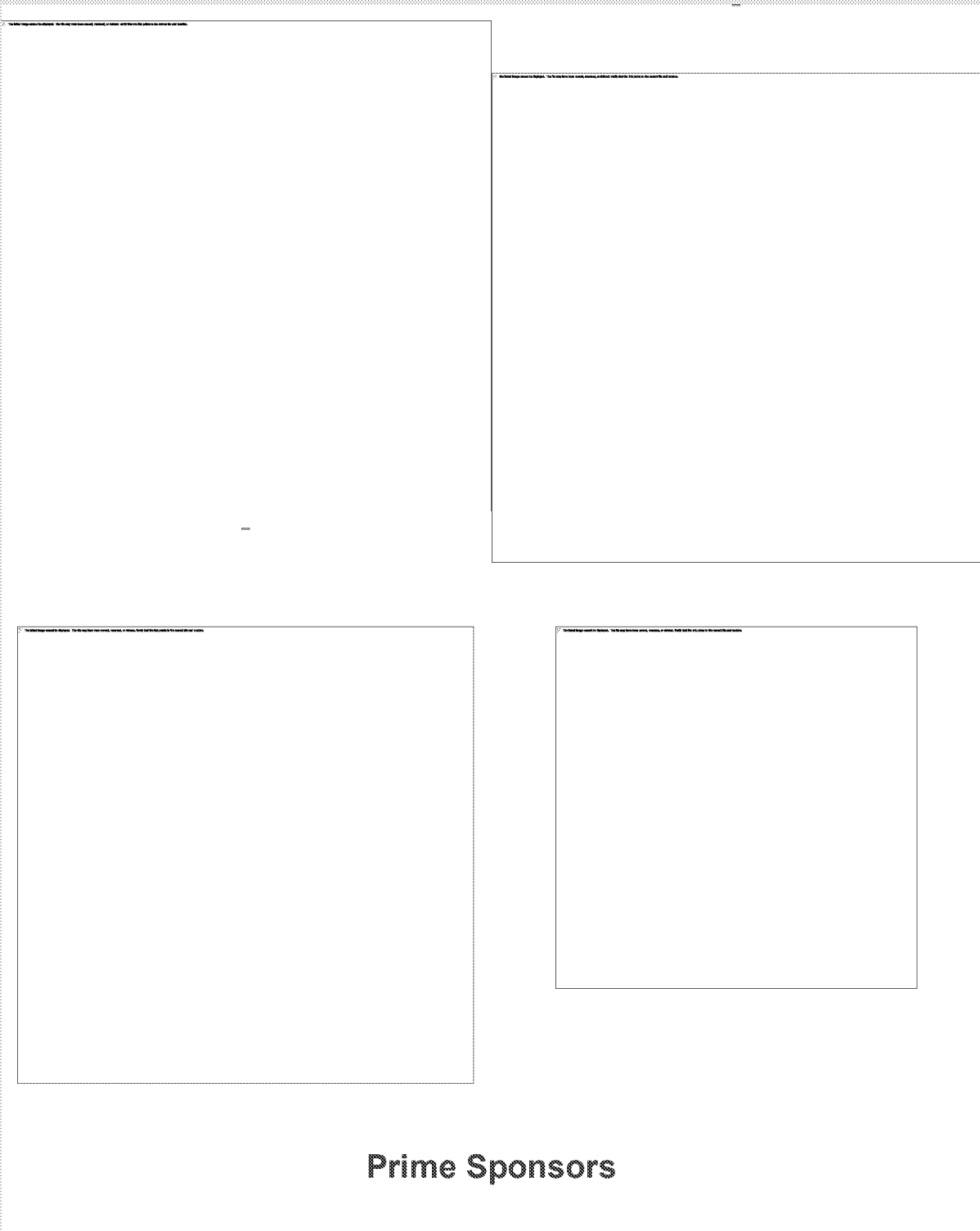
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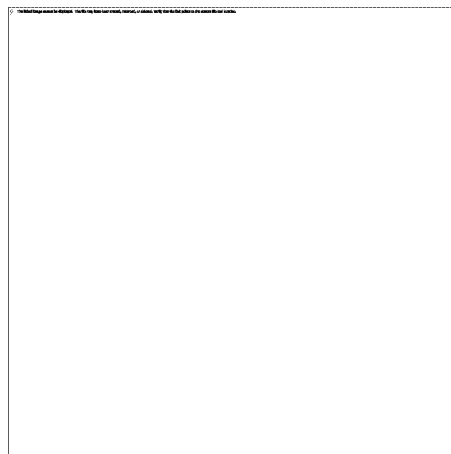
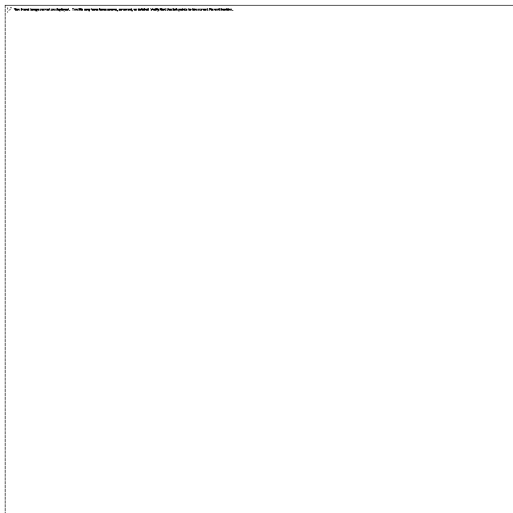
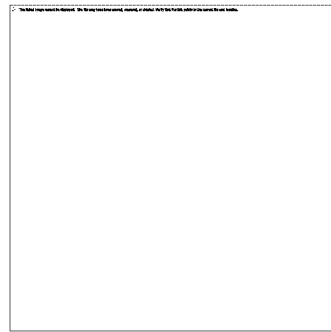
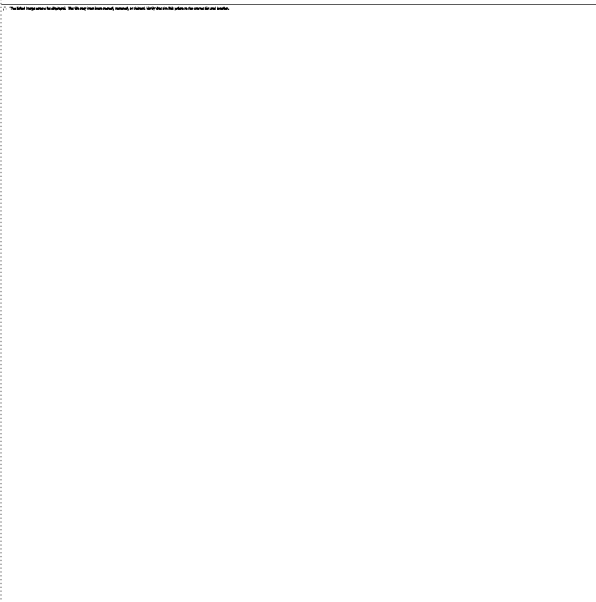
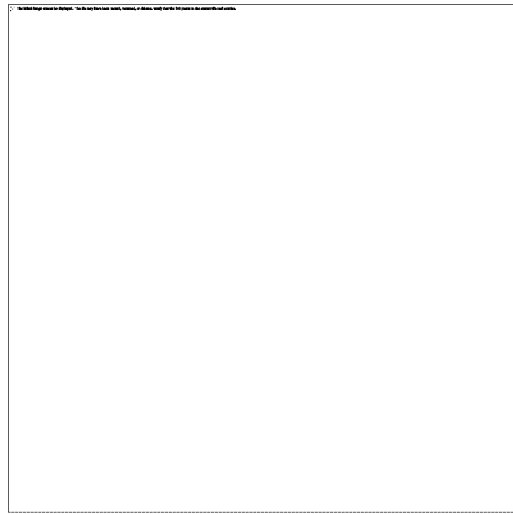
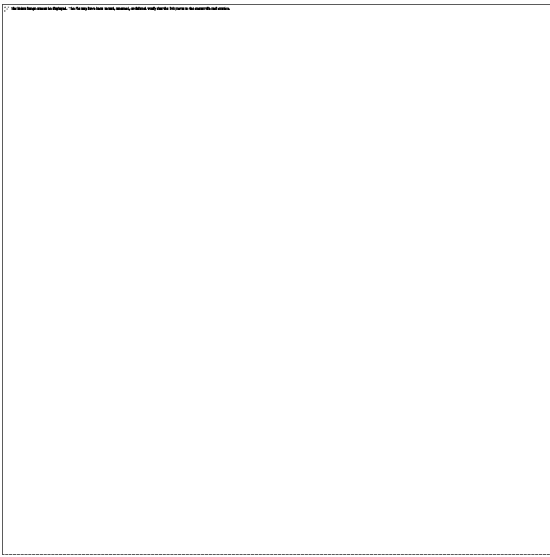
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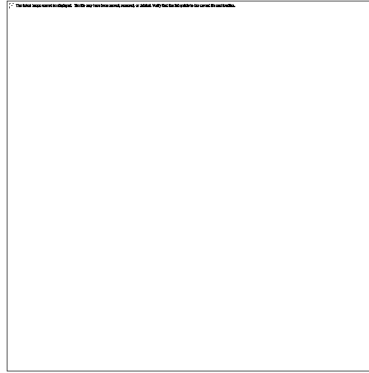
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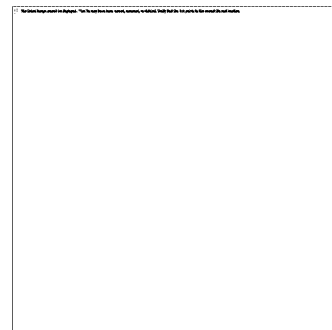
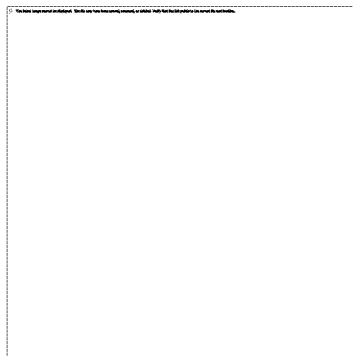
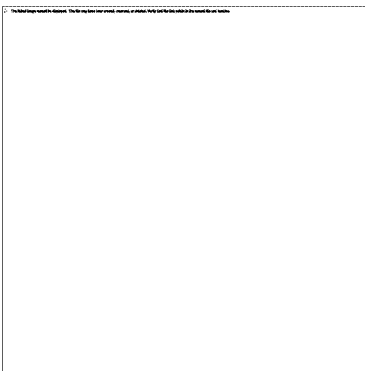
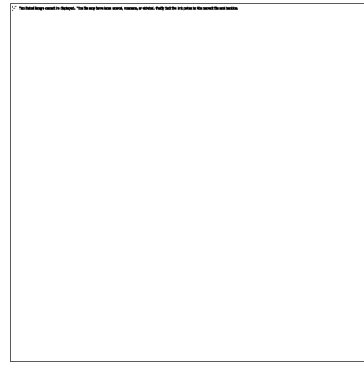
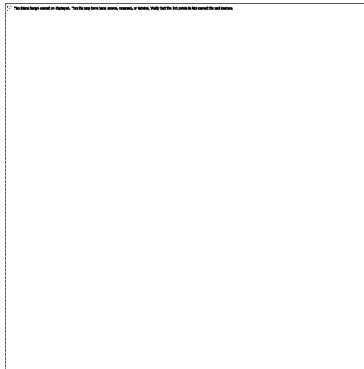
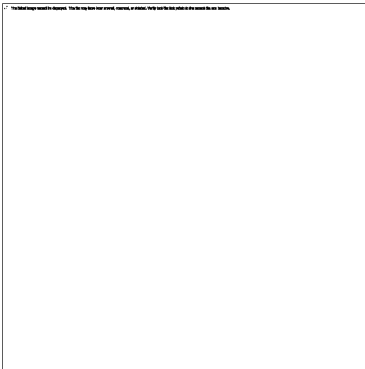


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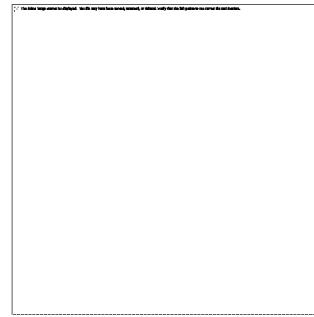
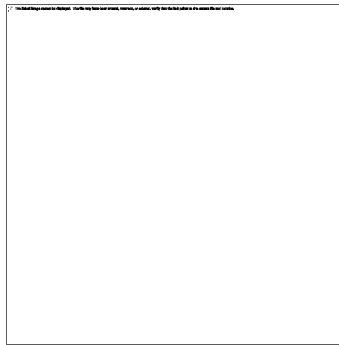
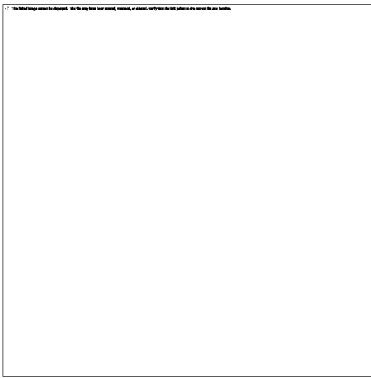




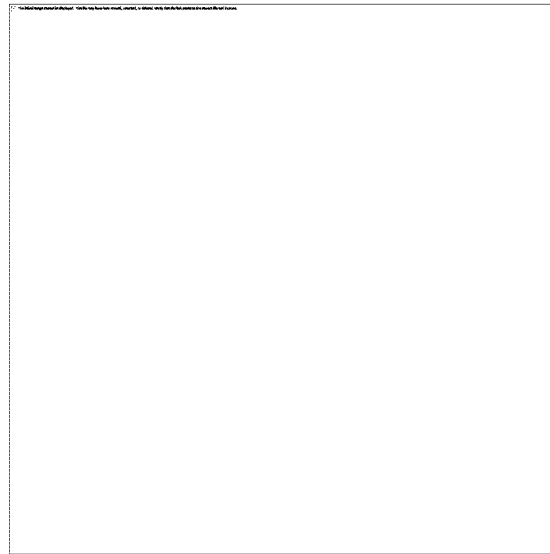
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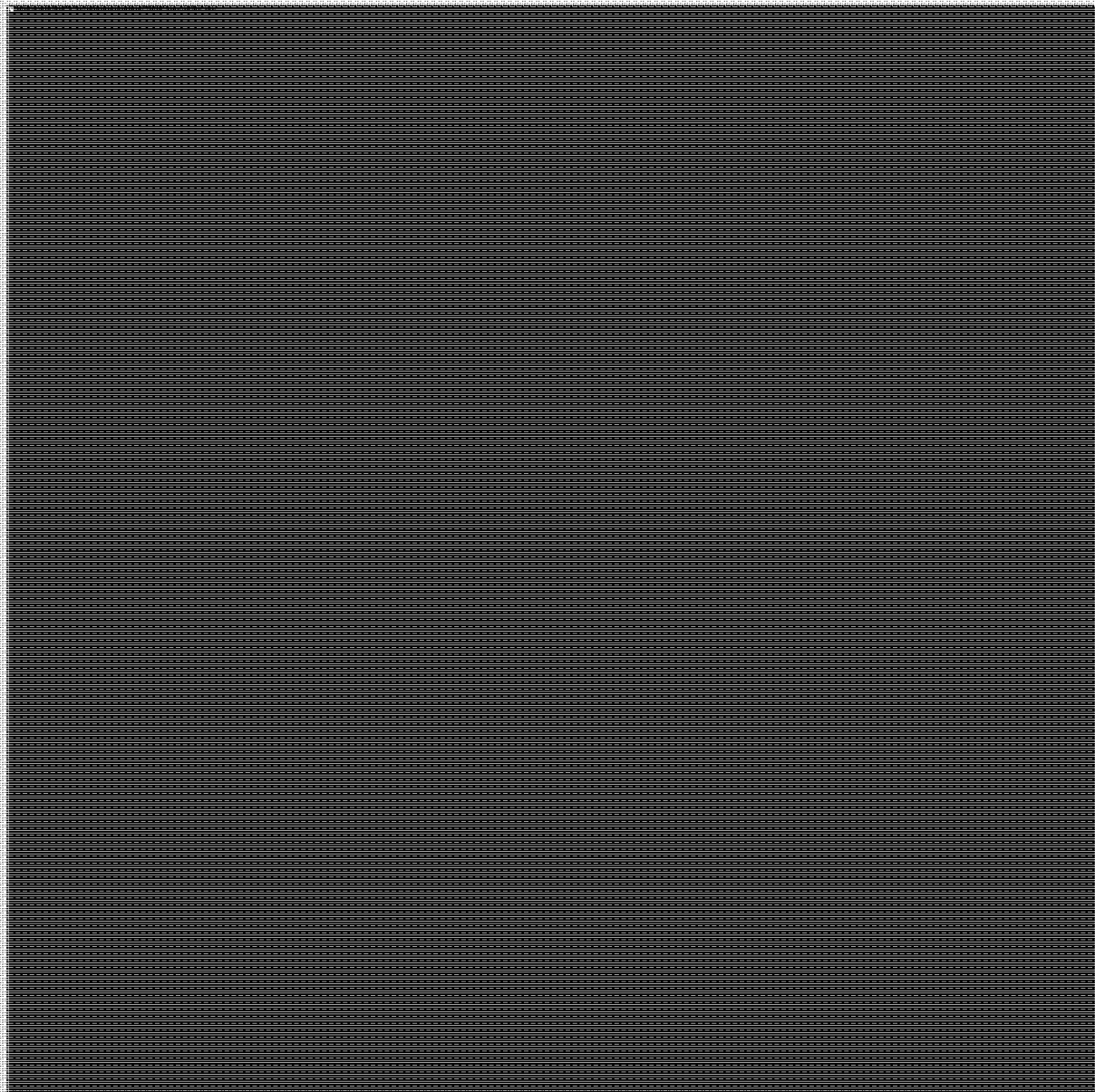
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**Sent:** 1/18/2022 4:03:53 PM  
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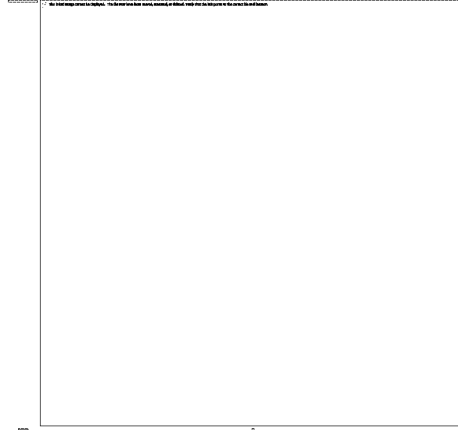
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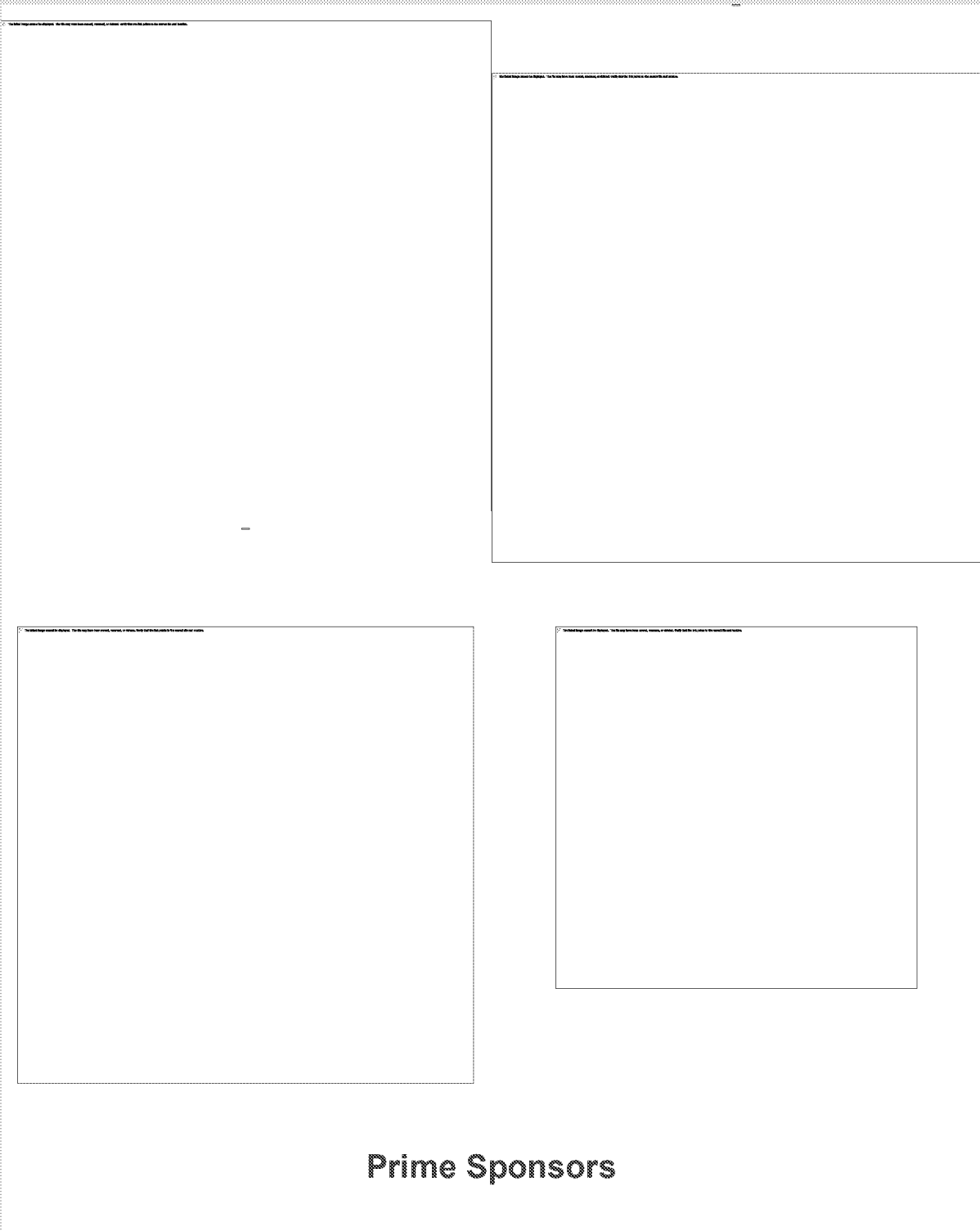
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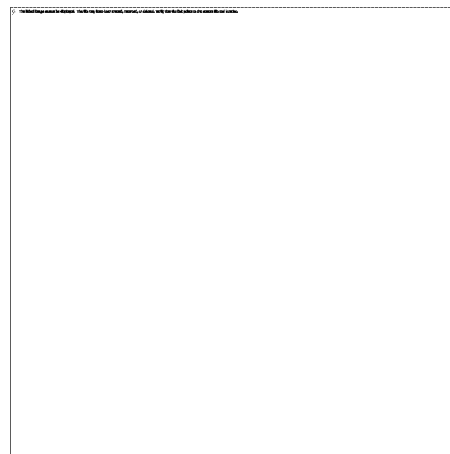
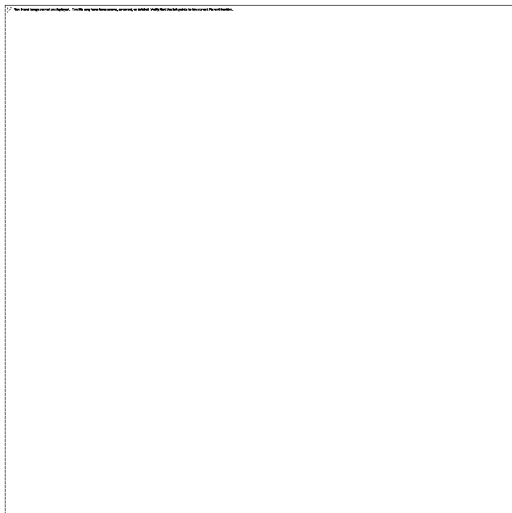
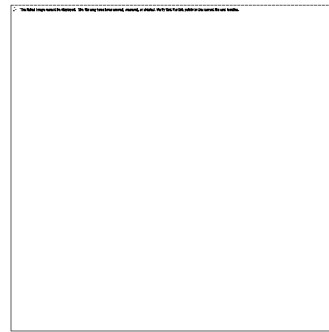
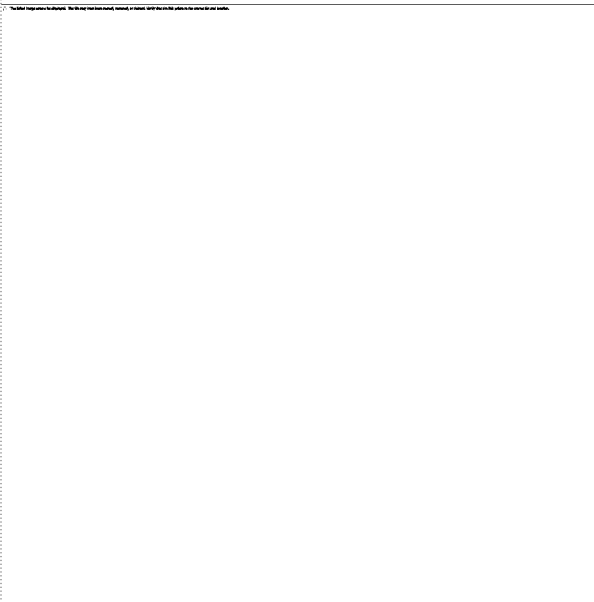
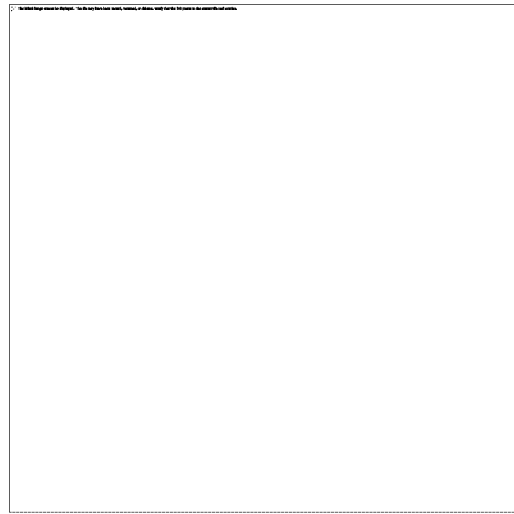
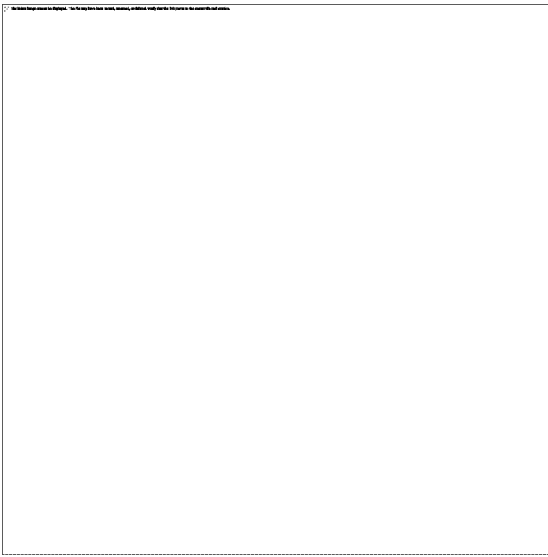
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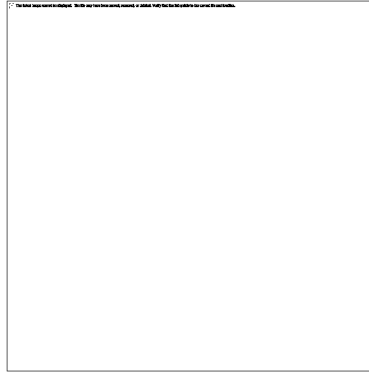
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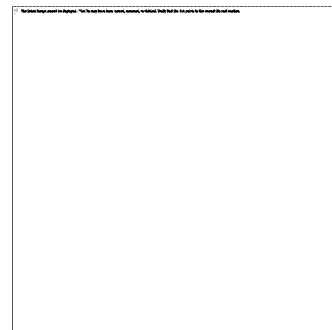
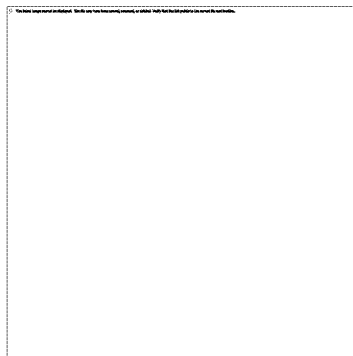
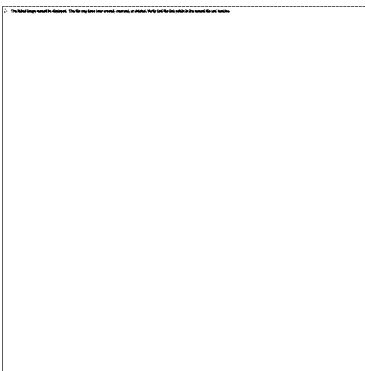
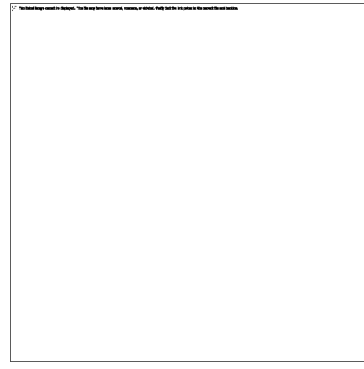
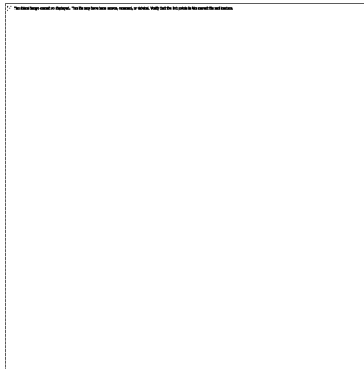
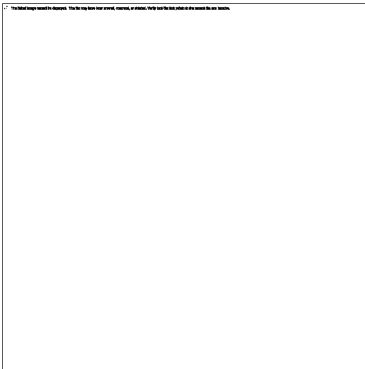
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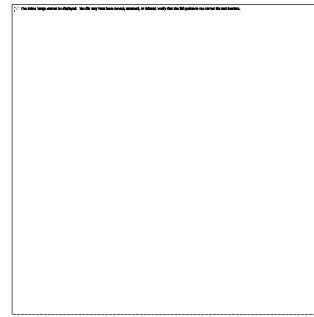
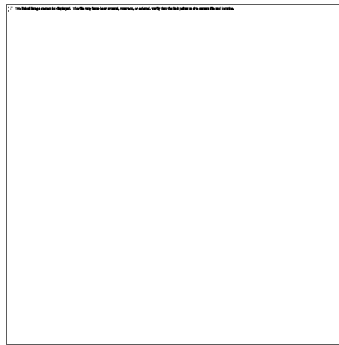
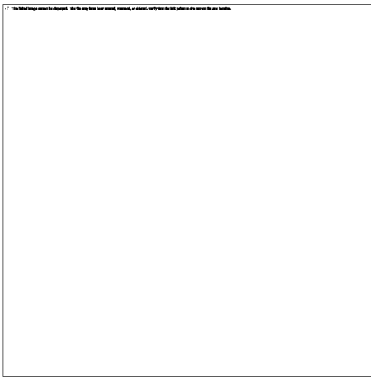




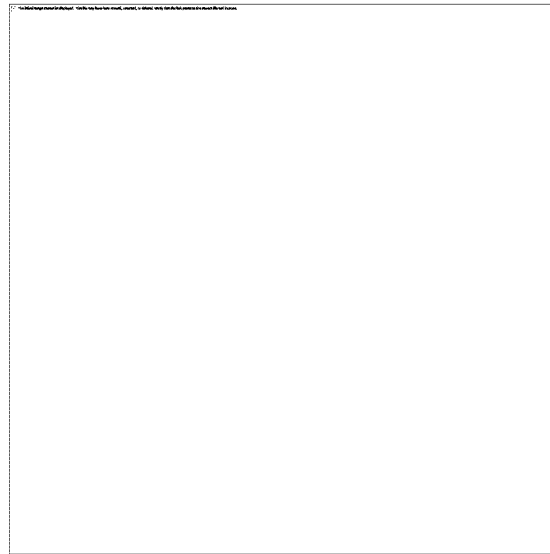


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**From:** Kabanda, Thierry [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B1A9A772E3C946CB99A35DA45F43DE6C-KABANDA, TH]  
**Sent:** 3/30/2021 3:06:29 PM  
**To:** Nunez, Alejandra [Nunez.Alejandra@epa.gov]; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand [carrie@usabiomass.org]; Dunham, Sarah [Dunham.Sarah@epa.gov]; Hengst, Benjamin [Hengst.Benjamin@epa.gov]  
**CC:** Paul Machiele (machiele.paul@epa.gov) [machiele.paul@epa.gov]; Greenglass, Nora [Greenglass.Nora@epa.gov]  
**Subject:** Meet with Biomass Power Association  
**Attachments:** Re: FW: Meeting Request: Electricity in the RFS; External meeting request\_.docx  
**Location:** Microsoft Teams Meeting  
**Start:** 4/13/2021 5:00:00 PM  
**End:** 4/13/2021 5:30:00 PM  
**Show Time As:** Busy

**Required Attendees:** Nunez, Alejandra; bob@usabiomass.org; psoos@covanta.com; pserfass@ttcorp.com; mgoo@waxmanstrategies.com; Carrie Annand; Dunham, Sarah; Hengst, Benjamin  
**Optional Attendees:** Paul Machiele (machiele.paul@epa.gov); Greenglass, Nora



Re: FW: Meeting Request: Electric...



External meeting request\_.docx

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## Message

**From:** Simon, Karl [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4D781D1AD595415DB3A4E768C2D2B3FC-SIMON, KARL]  
**Sent:** 10/18/2021 12:36:31 AM  
**To:** Nelson, Matthew [Matthew.Nelson@electrifyamerica.com]  
**Subject:** RE: meeting with Electrify America

Thanks Matt. I think your briefing went well and gave folks some good additional information to think through. Hope the vacation ended up being fun.

---

**From:** Nelson, Matthew <Matthew.Nelson@electrifyamerica.com>  
**Sent:** Friday, October 15, 2021 7:11 PM  
**To:** Dunham, Sarah <Dunham.Sarah@epa.gov>; Poliakoff, Andrew <Andrew.Poliakoff@electrifyamerica.com>; Michael Goo <mgoo@waxmanstrategies.com>; Haley Armstrong <harmstrong@ajw-inc.com>; Charmley, William <charmley.william@epa.gov>; Machiele, Paul <machiele.paul@epa.gov>; Herbolsheimer, Courtney <herbolsheimer.courtney@epa.gov>; Hengst, Benjamin <Hengst.Benjamin@epa.gov>; Chris Miller <cmiller@ajw-inc.com>; Simon, Karl <Simon.Karl@epa.gov>  
**Cc:** Kirkbride, Robin <Kirkbride.Robin@epa.gov>; Gonzalez, Gail <Gonzalez.Gail@epa.gov>; Noah Rothstein <noah@waxmanstrategies.com>  
**Subject:** RE: meeting with Electrify America

Sarah,

Please accept my sincere thanks to you and your team for taking time to meet with us last week. As you requested, I have attached a copy of the presentation, which contains confidential business information and is therefore shared in confidence.

In addition, I have attached a recent filing that Electrify America made on demand charges in New Jersey, and below are links to each of the papers referenced during our discussion, or in the slides.

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- **Slide 7: DOE: Biogas Opportunities Roadmap (notes the methane emission reductions that would occur through heightened biogas capture)**

We look forward to further conversations, and to that end, I would like to reiterate that we are happy to present this to others on your staff. Michael will of course follow up directly with Kyle to offer a briefing, as was suggested during the call, but we would also be happy to brief others at OTAQ if you suggest.

Research shows that eRINs would do more to enable attainment of President Biden's 2030 goals of 500,000 charging stations and 50% EV sales than any other policy under current law. Operating cost challenges threaten the charging industry's ability to sell its low carbon fuel for less than gasoline, but that is a problem the RFS was tailor designed to address. eRINs would help address that challenge, thereby serving as a companion operating cost strategy to the proposed \$7.5B capital investment in EV charging laid out in the Infrastructure Investment and Jobs Act. For these reasons, we encourage EPA to act on this opportunity with urgency.

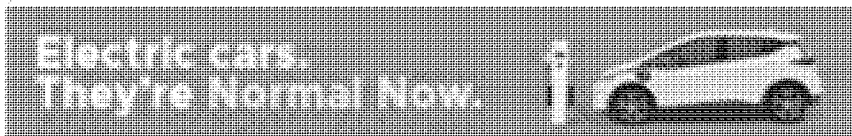
Please have a lovely weekend, and please view us as a resource as you consider a path forward on this very important opportunity.

Sincerely,

**Matthew B. Nelson**

Director of Government Affairs

Electrify America  
2003 Edmund Halley Drive  
2<sup>nd</sup> Floor, Suite 200  
Reston, VA 20191  
m: +1 (571) 352-8840  
[matthew.nelson@electrifyamerica.com](mailto:matthew.nelson@electrifyamerica.com)



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## Message

**From:** Simon, Karl [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4D781D1AD595415DB3A4E768C2D2B3FC-SIMON, KARL]  
**Sent:** 11/5/2021 3:37:43 AM  
**To:** Michael Goo [mgoo@waxmanstrategies.com]  
**Subject:** RE: meeting with Electrify America

Michael,

Appreciate the heads up. I believe Kyle has been out of the office a fair amount recently so think it makes sense to reach back to Paul to set something up. As Paul said, Kyle works for him. Thanks

Karl

---

**From:** Michael Goo <mgoo@waxmanstrategies.com>  
**Sent:** Wednesday, November 3, 2021 11:27 AM  
**To:** Simon, Karl <Simon.Karl@epa.gov>  
**Subject:** FW: meeting with Electrify America

Hey Karl---on another front---we did want to go back and talk to Paul and Kyle, as Paul suggested, about the verifiable data sets that we showed Sarah. It would be great if you could help us get that meeting in place...

Thanks for all your help....

---

**From:** Michael Goo  
**Sent:** Monday, October 25, 2021 3:54 PM  
**To:** [machiele.paul@epa.gov](mailto:machiele.paul@epa.gov); [borgert.kyle@epa.gov](mailto:borgert.kyle@epa.gov)  
**Cc:** Noah Rothstein <[noah@waxmanstrategies.com](mailto:noah@waxmanstrategies.com)>  
**Subject:** meeting with Electrify America

Hey Paul and Kyle:

Hope you both are doing well.

I wanted to follow-up with you guys and see if you wanted to set up a time to talk through some of this.

Kyle: sorry you were not able to attend the prior meeting with Sarah. Paul suggested we try and find some time to make sure you had a chance to see and discuss these materials as well.

Let me know if there are some time windows that work for you, and Noah will set something up with you and the EA folks.

Thanks again for all your help and we look forward to talking.

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**From:** Nelson, Matthew <[Matthew.Nelson@electrifyamerica.com](mailto:Matthew.Nelson@electrifyamerica.com)>  
**Sent:** Friday, October 15, 2021 7:11 PM  
**To:** Dunham, Sarah <[Dunham.Sarah@epa.gov](mailto:Dunham.Sarah@epa.gov)>; Poliakoff, Andrew <[Andrew.Poliakoff@electrifyamerica.com](mailto:Andrew.Poliakoff@electrifyamerica.com)>; Michael Goo <[mgoo@waxmanstrategies.com](mailto:mgoo@waxmanstrategies.com)>; Haley Armstrong <[harmstrong@ajw-inc.com](mailto:harmstrong@ajw-inc.com)>; Charmley, William <[charmley.william@epa.gov](mailto:charmley.william@epa.gov)>; Machiele, Paul <[machiele.paul@epa.gov](mailto:machiele.paul@epa.gov)>; Herbolsheimer, Courtney <[herbolsheimer.courtney@epa.gov](mailto:herbolsheimer.courtney@epa.gov)>; Hengst, Benjamin <[Hengst.Benjamin@epa.gov](mailto:Hengst.Benjamin@epa.gov)>; Chris Miller <[cmiller@ajw-inc.com](mailto:cmiller@ajw-inc.com)>; Simon, Karl <[Simon.Karl@epa.gov](mailto:Simon.Karl@epa.gov)>

**Cc:** Kirkbride, Robin <Kirkbride.Robin@epa.gov>; Gonzalez, Gail <Gonzalez.Gail@epa.gov>; Noah Rothstein <noah@waxmanstrategies.com>

**Subject:** RE: meeting with Electrify America

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Sarah,

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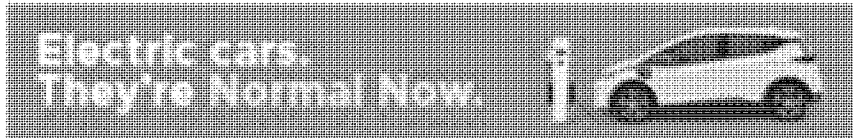
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Message

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**From:** Christina Baworowsky [christina.baworowsky@chargepoint.com]  
**Sent:** 6/17/2021 6:42:13 PM  
**To:** Simon, Karl [Simon.Karl@epa.gov]  
**Subject:** ChargePoint: Follow up request

Karl,

Thank you again for chatting with ChargePoint last week. I know you had to jump a little early but it is my hope that we may be able to continue our conversation from last week, and any discuss topics like the eRIN pathway and pending legislation pertaining to MHDV rebates, that would be run through EPA.

Let me know if there is a time in the near future when we could set up a conversation with you and the proper EPA staff.

Thank you,

Christina

Christina Baworowsky  
Senior Manager, Federal Policy  
ChargePoint | chargepoint.com  
+1 847.714.2084 direct

Message

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**From:** Michael Goo [mgoo@waxmanstrategies.com]  
**Sent:** 11/3/2021 3:26:47 PM  
**To:** Simon, Karl [Simon.Karl@epa.gov]  
**Subject:** FW: meeting with Electrify America  
**Attachments:** EPA Outreach Deck - contains CONFIDENTIAL BUSINESS INFORMATION.pdf; Electrify America Comments on NJ BPU Straw Proposal 6-17-20 (002).pdf

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Thanks for all your help...

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**Sent:** Monday, October 25, 2021 3:54 PM  
**To:** machiele.paul@epa.gov; borgert.kyle@epa.gov  
**Cc:** Noah Rothstein <noah@waxmanstrategies.com>  
**Subject:** meeting with Electrify America

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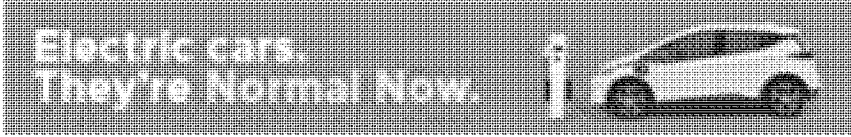
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