



Natural Gas Vehicles for America

400 North Capitol Street, N.W.
Washington, D.C. 20001
ngvamerica.org

Jeffrey Clarke

Director of Regulatory
Affairs and General Counsel
jclarke@ngvamerica.org
202.824.7364 office
202.824.7087 fax

September 22, 2014

Mr. Michael S. Waugh
Chief, Transportation Fuels Branch
1001 I Street
California Air Resources Board
Sacramento, CA 95814

RE: Low Carbon Fuel Standard – Proposed Updates to the GREET 2.0 Model

NGVAmerica respectfully submits the following comments on the proposed changes to the California GREET Model. NGVAmerica is a national trade association dedicated to creating a profitable, sustainable and growing market for compressed natural gas and liquefied natural gas powered vehicles. NGVAmerica represents more than 230 companies, including vehicle manufacturers; natural gas vehicle component manufacturers; natural gas distribution, transmission, and production companies; natural gas development organizations; non-profit advocacy organizations; state and local government agencies; and fleet operators.

The California Air Resources Board (CARB) currently is considering changes to the model its uses to assess the carbon intensity of transportation fuels. This effort is intended to support the state's low-carbon fuel standard but likely will also impact other regulatory programs in the state and possibly other states (as many states follow California's lead on environmental issues). Based on a review of presentations given by CARB staff, it appears that some of the proposed changes will drastically alter the carbon intensity of some fuels. The information supporting these changes, however, has not been made available to those impacted by the changes and, therefore, there has not been a full vetting of the issues related to these changes. Reports that natural gas emissions are higher and not lower as a result of more recent analysis of upstream emissions do not appear to be consistent with information included in the April 2014 U.S. EPA report, *Inventory of Greenhouse Gas Emissions and Sinks*, which shows declining natural gas emissions.

We are concerned about the appropriateness of the proposed changes and also the uncertainty that these changes create for business and industry impacted by the LCFS rules as well as the broader impact this could have on the impression that other important stakeholders will have with respect to the benefits of using natural gas. The natural gas industry has made great strides in the past several years in increasing fueling infrastructure, advancing the development of new vehicle platforms and transitioning more fleets to use of natural gas. While economics has played a large role in the interest and development of natural gas as a transportation fuel, there has always been a strong environment case for using natural gas and this case continues to influence demand for and support for natural gas vehicles. There is every reason to believe that natural gas vehicles can continue to be part of the environmental solution going forward as additional advancements in vehicles efficiency and technology allow for even cleaner and less polluting natural gas vehicles.

Given the significant impact CARB's changes could have on the market for natural gas and other transportation fuels, we believe there must be a full vetting of data that is being used to support these changes. Moreover, given that there are numerous studies underway, specifically to assess the extent of emissions from the natural gas industry and the fact that there are many new regulatory as well as voluntary programs underway or planned to address natural gas emissions, it is premature to lock in changes to the CA LCFS based on a static and possibly incorrect view of today's emissions.

We, therefore, respectfully urge the Air Resources Board to refrain from making additional changes to the California GREET model at this time.

Sincerely,

Handwritten signature of Jeffrey T. Clark in black ink.

CC:

wes.ingram@arb.ca.gov

katrina.sideco@arb.ca.gov

hafizur.chowdhury@arb.ca.gov

chan.pham@arb.ca.gov

todd.dooley@arb.ca.gov