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Transmitted electronically to the Air Resources Board Comment Log: [schdincentivesip2018](#)

Re: SoCalGas Comments on the South Coast On-Road Heavy-Duty Vehicle Incentive Measure

Thank you for the opportunity to comment on the South Coast On-Road Heavy-Duty Vehicle Incentive Measure Report (Report). Overall, SoCalGas supports incentives for cleaner engines in the South Coast Air Basin to help the region meet its 2023 ozone attainment goals.

The Report states, “Refuse trucks are envisioned to be the first eligible projects because there is currently a certified and commercially-available Low-NOx engine that is appropriate for this use. A Low-NOx engine appropriate for a drayage truck is expected to be certified and commercially-available by 2019.”

This statement is factually incorrect. Ultra-Low NOx engines are commercially available today and can play a critical role in reducing Oxides of Nitrogen (NOx) emissions. The Air Resources Board (ARB) certified the Cummins Westport 11.9-liter engine to meet ARB’s Optional Low NOx Standard of 0.02 grams of NOx per brake horsepower hour (g/bhp-hr)¹. The certification level was 0.01 g/bhp-hr, half of the standard. When paired with renewable natural gas (RNG), these engines can achieve over 90% reduction in NOx and can significantly reduce greenhouse gases (GHG). RNG, on average, can reduce GHG emissions by 60%, but can also be carbon negative depending on the source. A recent study conducted by the University of California, Riverside’s Center for Environmental Research and Technology showed that in some drayage duty cycles, the ultra-low NOx engines achieved a 99.8 percent reduction of NOx from existing diesel trucks.

On March 3, 2017, The South Coast Air Quality Management District (SCAQMD) Board adopted the Air Quality Management Plan (AQMP) for inclusion in to the State Implementation Plan. In the Board Resolution, the SCAQMD Board stated that “an accelerated deployment of current and emerging near-zero emission natural gas engine technologies will provide significant, cost effective and near-term benefits to regional and local air quality, energy supply security, and public health...” The SCAQMD Board also resolved, “that the mobile source incentive program for heavy-duty vehicles outlined in the 2016 AQMP place priority on the most cost-effective technologies to reach short-term air quality goals such as current and emerging near-zero emission natural gas engine technologies.”² The Report directs staff to focus on refuse projects, however this direction is based on misinformation. We recommend

¹ https://www.arb.ca.gov/msprog/onroad/cert/mdehdehdv/2018/cummins_hhdd-ub_a0210674_11d9_0d02-0d01_ng.pdf

² A Resolution of the South Coast Air Quality Management District Governing Board certifying the Final Program EIR for the 2016 Air Quality Management Plan (AQMP), and adopting the 2016 AQMP, which is to be submitted into the California State Implementation Plan (SIP). March 3, 2017.

that the language from the Report quoted above be removed from the Report and that the South Coast Air Quality Management District have the discretion to fund projects that best help meet the attainment goals of the region, consistent with the SCAQMD Board Resolution.

Additionally, as the Low-NOx engine is available for heavy duty truck applications, we recommend that more funding is made available to maximize early emission reductions.

Thank you again for the opportunity to comment on this matter. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'KM' or similar initials, written in a cursive style.

Kevin Maggay
Energy and Environmental Affairs