

October 24, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95812
ATTN: Mr. Wes Ingram, Manager, Fuels and Evaluation Section
Mr. Chan Phan, Air Resources Engineer

RE: LCFS Program - Comments on Proposed Changes to California GREET Model

Dear Mr. Ingram and Mr. Phan,

Westport appreciates the opportunity to comment on CARB staff's proposed changes for the California GREET Model under efforts to reauthorize the Low Carbon Fuel Standard (LCFS) regulation.

Westport engineers the world's most advanced natural gas engines and vehicles. Westport and its joint venture Cummins Westport have deployed thousands of natural gas engines in California, across the United States and around the world. We are continuously working towards the development and commercialization of efficient low emission technologies in all transportation segments that can assist in the mitigation of air pollution and greenhouse gases in California. The growth of natural gas vehicles enables cleaner transportation options, new job opportunities and increased competitive advantages to end users by use of a lower cost domestic fuel. Significant changes to the GREET model may have profound effects on the continuing growth and development of the natural gas vehicle market in California.

We are writing to indicate our overall support for reauthorization of the LCFS. However, we urgently **request that CARB allow additional time for review of, and potential modifications to, its proposed changes to the CA-GREET model.** As CARB staff have made clear, methane leakage is very complex, and there is much uncertainty with existing data. Significant new data on this and other related issues should be available in the next six to twelve months. It is premature to change the carbon intensity values for natural gas (or any other fuel pathways) before that information becomes available. We, therefore, urge CARB to hold off on updating the CA GREET model in order to allow sufficient time to obtain, review and incorporate emerging, peer-reviewed information about methane leakage. As we understand it, CARB can reauthorize the LCFS legislation in February 2015 without immediate updates to the CA-GREET model.

Westport also has concerns over the omission of compression ignition natural gas engine technologies in the model as well as the duty cycles used to evaluate fuel efficiencies. As well, further clarity is needed on the assessment of fuels such as electricity and hydrogen that use natural gas as a feedstock in the update to CA-GREET.

The LCFS has been a positive force for alternative fuels. Westport strongly believes that it is critically important to improve the science on which this program is based. We therefore respectfully ask CARB to separate out reauthorization of the LCFS from adoption of new CI values in CA-GREET at least until the peer-reviewed data on methane leakage is available and can be fully considered.

Sincerely,



Karen Hamberg
Vice President, Strategy
Westport