
From: John Marlow <john.marlow@cleanenergyfuels.com>
Sent: Tuesday, October 11, 2022 9:47 AM
To: ARB Clerk of the Board
Subject: Fix the ACF (acf2022)

Follow Up Flag: Follow up
Due By: Wednesday, October 12, 2022 4:00 PM
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Dear Clerk of the Board,

Clean Energy Fuels appreciates the opportunity to provide public comment on the Proposed Advanced Clean Fleets Regulation (ACF).

If you really intend to adopt electric vehicles, you have to face certain realities. For example, unfortunately, the data on EV Class 8 trucks isn't available yet so ill use a home charging system for a Tesla. A Tesla requires 75 amp service. The average house is equipped with 100 amp service. On our small street (approximately 25 homes), the electrical infrastructure would be unable to carry more than three houses with a single Tesla each. Our infrastructure cannot bear the load even for the everyday automobile.

Another known fact, an average Tesla battery, is made of 25 pounds of lithium, 60 pounds of nickel, 44 pounds of manganese, 30 pounds of cobalt, 200 pounds of copper, and 400 pounds of aluminum, steel, and plastic. This averages to 750-1,000 pounds of minerals, that has to be mined and processed into a battery that merely stores electricity..... Electricity which is generated by oil, gas, coal, nuclear, or water (and a tiny fraction of wind and solar)....

The buzz may be electric! The biggest problem with electric is that it's not yet a real solution for heavy-duty trucks. With any untested and unproven technology comes concerns about the ability to meet current operational and economic requirements. Electric trucks will be costly to buy and will likely raise operational costs.

The Near Zero Now solution is powered by an engine that features next generation technology to improve reliability and durability and also runs on RNG (Renewable Natural Gas) with a -460.4 Carbon Intensity rating. Manufactured by Cummins, the Near Zero engine recirculates exhaust gases back to the engine cylinders, while the closed crankcase ventilation system eliminates emissions.

If your goal is to clean the air, the pathway is already in place for class 8 vehicles with the Cummins natural gas engine running on RNG.

We urge you to amend the ACF regulation for more flexibility near zero solutions so that the regulation catches up with technology and not technology catching up with the regulation.

Thank you,

John Marlow, Clean Energy Fuels

Sincerely,

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