

June 20, 2016

Clerk of the Board Air Resources Board 1001 I Street Sacramento, CA 95814

> Re: Cummins Inc. Public Comments Regarding the Proposed Fiscal Year 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program

To Whom It May Concern:

Thank you for the opportunity to provide public comments regarding the Proposed Fiscal Year 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program. These comments pertain to the version of the Funding Plan that was released on May 20, 2016.

Let me begin by expressing my appreciation for the willingness of the ARB staff to better understand the technology and unique market factors related to the rollout of the Cummins Westport ISL G Near Zero natural gas engine. We hope that the hands-on demonstrations helped to provide some insight into the decisions facing heavy duty vehicle owners as they choose between rebuilding an existing natural gas engine or repowering with a new near zero natural gas engine.

My comments today pertain specifically to the Low NOx Engine Incentive section of the Proposed Funding Plan. We support the decision by the ARB to increase the maximum per engine incentive from \$15,000 to \$18,000. We believe this increase, when coupled with additional funding available through the Energy Commission's natural gas vehicle incentives, Proposition 1B and the Carl Moyer Program, will encourage heavy duty vehicle owners to purchase new near zero natural gas engines or repower their existing natural gas engine vehicles. However without these additional funding sources, the individual engine incentive may not have the desired effect of encouraging fleet owners to convert to near zero natural gas engines.

We also support the requirement that low NOx engines or vehicles purchased using the incentive be required to use renewable fuel. We agree that the use of the near zero natural gas engines in conjunction with renewable natural gas will help California reduce GHG and criteria

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pollutant emissions and offers the most economical solution to achieve its air quality goals. It should be noted that the mandate of renewable fuel use may serve as a barrier to the use of the incentive by some heavy duty vehicle owners as it could increase their overall cost of use. In order to encourage as many users as possible to utilize the incentive program, it will be important to ensure that the total incentive package is adequately funded to cover most of the incremental cost between an existing natural gas engine and a near zero product.

Thank you again for the opportunity to submit our comments regarding the Proposed Fiscal Year 2016-17 Funding Plan for Low Carbon Transportation and Fuels Investments and the Air Quality Improvement Program. We remain committed to working with ARB staff to make this program as successful as possible to help California achieve its clean air goals.

Sincerely,

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Rob Neitzke President Cummins Westport Inc.