



California Natural  
Gas Vehicle Coalition

April 13, 2017

Submitted electronically

**RE: Proposed Changes to the Carl Moyer Program**

The California Natural Gas Vehicle Coalition (CNGVC) would like to submit the following comments concerning the proposed changes to the Carl Moyer Memorial Air Quality Standards Attainment Program.

**About CNGVC**

CNGVC is an association of natural gas vehicle and engine manufacturers, utilities, fuel providers and fleet operators serving the state. We are united in the belief that wider adoption of clean-running NGVs—a proven technology in use worldwide—is key to helping California reduce greenhouse gas emissions, air pollution and petroleum dependence.

The Coalition is the industry's premier advocacy organization in California. We support new initiatives, provide up-to-date information on NGV technology and market developments, and work with legislators and regulators to develop policies that will increase alternative fuel and vehicle use. We also advise stakeholders on testing and demonstration programs and help NGV-related businesses break into the California market.

**Recommendations**

The Carl Moyer Program has been a leader in incentivizing technologies and emissions that go beyond the minimum Clean Air requirements. We applaud ARB for put time and effort into making the program stronger.

However, some proposed changes to the Program could potentially hinder the ARB's commitment to emission-reducing strategies.

The Program exists to improve the accessibility and availability of funding for clean innovations, and a few minor changes will help accomplish these goals more efficiently. To encourage more California businesses and groups to invest in cleaner alternatives, CNGVC recommends the following:

1. **Developing an easy to use grant calculator:** Though Appendix C of the Program Guidelines offers complete instructions for calculating maximum grant eligibility, the information and formulas presented would benefit considerably from a more user-friendly format. Offering an easy to use digital calculator for potential grant recipients streamlines the application process, and would ensure that efforts towards reducing emissions are not discouraged by mathematical inaccessibility.
2. **Restoring new vehicle purchase incentives:** Recent adjustments by the ARB have removed the opportunity for interested parties to receive funding for new vehicle purchases. This is a step backward for California's clean air goals; vehicles that exceed strict emissions standards should be continue to be incentivized just as cleaner engines and equipment are. Changing the new vehicle provision back to its former status would ensure the ARB's priorities are aligned with companies and agencies interested in expanding their clean air fleets.

CNGVC believes that is essential to the success of the Program that the ARB will incorporate these recommendations in the next draft and looks forward to future collaboration with the ARB toward a healthier California.

Please don't hesitate to contact me if you have questions at [thomas@cngvc.org](mailto:thomas@cngvc.org) or at 888-538-7036.

Sincerely,



Thomas Lawson  
President