

June 14, 2016

The Honorable Gina McCarthy, Administrator  
United States Environmental Protection Agency  
William Jefferson Clinton Federal Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460  
[McCarthy.Gina@epa.gov](mailto:McCarthy.Gina@epa.gov)

RE: Support of Petition to EPA for Rulemaking to Adopt Ultra-Low NO<sub>x</sub> Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines (dated June 3, 2016)

Dear Administrator McCarthy:

Southern California Gas Company (SoCalGas) submits this letter in support of the above-referenced Petition filed with EPA on June 3, 2016 by the South Coast Air Quality Management District (SCAQMD), *et al.* The attainment of the federal ozone standards is vitally important to those communities in which SoCalGas operates and provides natural gas service.

SCAQMD and the California Air Resources Board (CARB) have demonstrated that attainment of the 1997 and the 2008 8-hour ozone standards in the South Coast Air Basin will be unachievable without emissions reductions from a new, ultra-low heavy-duty engine exhaust emission standard for NO<sub>x</sub>. In the South Coast Air Basin, 88 percent of regional NO<sub>x</sub> emissions come from mobile sources within the basin, and on-road heavy-duty diesel trucks are the largest categorical contributor.<sup>1</sup> CARB's Mobile Source Strategy demonstrates that implementation of all current rules will reduce NO<sub>x</sub> in the South Coast Air Basin by over 50 percent between 2015 and 2031, but that these reductions will not be sufficient to attain the ozone standards without a new federal, heavy-duty truck engine emission standard.<sup>2</sup>

As detailed in the Petition, a revised low NO<sub>x</sub> standard of 0.02g/bhp-hr is technologically and commercially feasible. In 2015, Cummins Westport Inc. certified the world's first heavy-duty engine at near-zero emission levels—90 percent below the existing federal standard, and certified to meet ARB's lowest-tier optional low-NO<sub>x</sub> emission standard. This "next generation" heavy-duty natural gas engine is now commercially available for transit bus, refuse, school bus, and medium-duty truck applications. Additional near-zero-emission heavy-duty natural gas engines are expected to follow by 2018, addressing a wider array of medium- and heavy-duty on-road applications.

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<sup>1</sup> SCAQMD, "Petition to EPA for Rulemaking to Adopt Ultra-Low NO<sub>x</sub> Exhaust Emission Standards for On-Road Heavy-Duty Trucks and Engines," (hereafter "Petition") p.12 (June 2016).

<sup>2</sup> CARB, "Mobile Source Strategy," p.22, 83 (May 2016).

The Honorable Gina McCarthy, Administrator

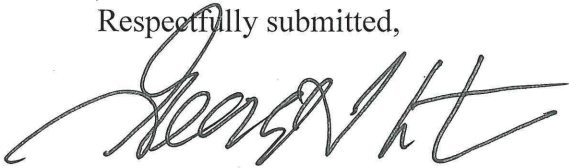
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The tailpipe emissions of heavy-duty vehicles running on these engines are as low as emissions associated with generating the electricity used to charge heavy-duty battery-electric vehicles with a state of the art generation plant. When paired with renewable natural gas, which provides the lowest carbon intensity of any transportation fuel available today, this technology has the added benefit of providing significant greenhouse gas emissions reductions (80 percent or greater).

SoCalGas supports federal leadership to implement an ultra-low heavy-duty engine emission standard for NOx in order to achieve the necessary emission reductions for the South Coast Air Basin to attain federal ozone standards.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "George Minter", with a stylized flourish at the end.

George Minter

Regional Vice President, External Affairs and Environmental Strategy

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