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June 22, 2022

RE: Comment on Draft 2022 Climate Change Scoping Plan

Dear Sir/Madame:

As Vice President of Legal and Government Affairs at Hexagon Agility, Inc. ("Hexagon Agility"), I am writing to provide comments on the Draft 2022 Scoping Plan Update ("Scoping Plan Update") to be considered by the California Air Resources Board ("CARB") at its meeting on June 23, 2022. Hexagon Agility encourages CARB to adopt alternative no. 3, also referred to as the Proposed Scenario, to achieve carbon neutrality by 2045, deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes and Executive Orders. However, while Hexagon Agility supports CARB's adoption of the Proposed Scenario, we are concerned that the current draft could result in a significant missed opportunity to reduce greenhouse gases ("GHG") using readily available and cost-effective technology—namely through utilization of low NOx trucks fueled by renewable natural gas ("RNG"). Thus, Hexagon Agility urges CARB to include language in the Proposed Scenario setting forth a strategy to utilize low NOx trucks operated on renewable fuels as an alternative to diesel.

As background, Hexagon Agility is the leading global provider of highly engineered and cost-effective compressed natural gas, liquid natural gas and propane fuel systems and Type 4 composite cylinders for medium- and heavy-duty commercial vehicles. Our solutions enable the safe and effective use of natural gas, propane, and hydrogen as transportation fuel. These clean fuels reduce GHG and other air emissions and save money for fleet operators and their customers. Additionally, Hexagon Purus, a Hexagon Agility affiliate, is a world leading provider of complete vehicle systems and battery packs for hydrogen fuel cell electric and battery electric vehicles including hybrid mobility applications on light, medium, and heavy-duty vehicles, transit buses, ground storage, distribution, maritime, rail, and aerospace.

Hexagon Agility is uniquely situated to offer a neutral perspective on the current clean-energy marketplace. RNG-fueled trucks remain the most widely available option to reduce GHG and NOx emissions and including specific language regarding this near-zero technology in the Proposed Scenario would make an immediate impact on GHG emissions in our state. RNG technologies are 90 percent cleaner than diesel and, unlike the lack of commercially available EV trucks, RNG fuel systems are readily available to help achieve NOx and toxic emissions reduction goals. While we look forward to the ultimate transition to zero emission vehicles, CARB should include a strategy in the Proposed Scenario to utilize this readily available, safe, and reliable technology to support the reduction of GHG emissions within our state.

Furthermore, it is important to note that, if heavy duty zero-emission vehicles are unavailable, there is no alternative in the heavy-duty sector to reduce GHG emissions besides low NOx vehicles. The electric grid in California is unreliable and insufficient at this time. Thus, CARB should adopt a plan that includes the use of low-carbon biofuels such as RNG to achieve cost-effective emissions reductions in the near term.

Accordingly, Hexagon Agility encourages CARB to include language in the Proposed Scenario to utilize low NOx trucks operated on renewable fuels as an alternative to diesel. We appreciate your consideration of the foregoing comments.

HEXAGON AGILITY INC

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Clean air everywhere



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Sincerely,

A handwritten signature in blue ink that reads "Ashley Remillard".

Ashley Remillard
Vice President, Legal