



October 17, 2022

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

Re: Proposed Advanced Clean Fleets Regulation

Dear Clerk:

I am writing on behalf of Air Liquide Advanced Technologies U.S. LLC (“Air Liquide”) to provide comments on CARB’s proposed Advanced Clean Fleets regulation. Air Liquide and its affiliated companies operate 128 facilities and employ over 2,000 people in California. Air Liquide’s parent and affiliated companies are the world’s leaders in industrial and medical gases, and Air Liquide is a leading producer of biogas and renewable methane in the United States.

Biogas is a critical component in meeting California’s current and future climate goals. We commend CARB for proposing a Scoping Plan Update that allows for the capture and use of biogas to reduce emissions of methane, a potent greenhouse gas. We also support CARB’s view, as stated in the Draft 2022 Scoping Plan Update, that gaseous fuels can be displaced by biogas in a wide range of sectors, and especially in transportation.

The Advanced Clean Fleets Regulation (ACF) will drive innovations in truck delivery to reduce emissions and reach a zero-emission vehicle fleet by the middle of this century. Unlike the Low Carbon Fuel Standard, however, the ACF does not focus on reducing the carbon intensity of truck traffic; it focuses only on the types of vehicles that fleet owners may add to their California fleets. The ACF requires the purchase of ZEVs starting in 2024 but allows hybrid vehicles to be counted as ZEVs until 2035. The ACF, however, does not allow trucks powered by renewable natural gas to be counted as ZEVs, even if those trucks have lower emissions than hybrid vehicles.

Biogas in many cases has a negative carbon intensity. That is, the use of biogas for transportation may result in a net decrease in greenhouse gases, on a carbon-dioxide-equivalent basis. These negative carbon intensities are documented in fuel pathways that CARB has approved under the Low Carbon Fuel Standard.¹ Therefore, Air Liquide requests that CARB treat trucks powered by renewable natural gas with zero or lower carbon intensity as equivalent to ZEVs. By doing so, CARB will be helping to reduce emissions in the short and medium terms by *more* than emissions would be reduced under the current draft of the regulation, and would be

¹ See Current Fuel Pathways Table, available at <https://ww2.arb.ca.gov/resources/documents/lcfs-pathway-certified-carbon-intensities> (last visited Oct. 7, 2022).

providing flexibility to fleet owners to use available natural gas vehicles with renewable fuel when zero-emission vehicles are not available.

Similarly, Air Liquide also urges CARB to treat trucks powered by renewable natural gas as equivalent to hybrid vehicles under the ACF if they produce emissions, on a well-to-wheels basis, equal to or lower than hybrid vehicles. This proposed change would have the same benefits as described above. It would reduce greenhouse gas emissions by more than the requirements of the current draft regulation, and it would provide greater flexibility to fleet owners.

Thank you for your time and consideration of these comments. We look forward to working with CARB to reduce methane emissions and achieve the State's climate goals.

Very truly yours,



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