



3335 Susan Street, Suite 100
Costa Mesa, CA 92626
www.agilityfuelsolutions.com
+1 949 236 5520

VIA E-EMAIL

August 24, 2020

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairperson Nichols:

On behalf of Agility Fuel Solutions (“Agility”), I am writing to provide comments on the Heavy-Duty Engine and Vehicle Omnibus Regulation and Associated Amendments (“Regulation”) proposed by the California Air Resources Board (“CARB”). Specifically, Agility encourages CARB to conclude that low NOx trucks should not lose eligibility for state vehicle incentive programs if they receive early sales credits, and that additional requirements for warranty, useful life, testing, etc. should not apply to low NOx trucks until 2027. In addition, Agility supports, and hereby incorporates by reference, the comments submitted by a coalition of natural gas stakeholders on August 19, 2020, to which Agility was a signatory. Agility will not repeat the points raised in the comment letter here. Agility appreciates the time and energy CARB has spent developing and evaluating the Regulation and commends CARB’s work towards achieving a goal that is central to Agility’s purpose: *“clean air everywhere.”*

Agility is the leading global provider of highly-engineered and cost-effective clean fuel solutions for medium- and heavy-duty commercial vehicles, working with original equipment manufacturers to develop products for their vehicle platforms. Agility also works with dealers and fleet operators directly to educate them about their clean fuel options, support their adoption of clean fuel vehicles, and provide ongoing customer care. Agility and its affiliates’ products include natural gas, hydrogen, and battery electric energy storage and delivery systems, Type 4 composite natural gas cylinders, propane and natural gas engine fuel systems, and propane dispensers. Agility is the most recognized brand for performance, reliability, durability, and safety of its fuel systems, as well as its engineering capabilities and superior end-to-end customer service.

Heavy-duty low NOx trucks using renewable fuel remain one of the most cost-effective remedies to address greenhouse gas (GHG) and NOx emissions, especially in the near-term. Heavy-duty low NOx technologies are certified by CARB as 90 percent cleaner than diesel and are available today to help CARB achieve NOx and toxic emissions goals on time. Moreover, heavy-duty low NOx trucks are only continuing to improve. Indeed, Agility recently applied for two additional low NOx certifications from CARB for its 8.0L 488LPI propane system and its 6.0L RNG/CNG system. The 8.0L propane system will be certified at 0.015 g/bhp, which easily satisfies CARB’s 0.02 NOx standard. Even more impressive, the 6.0L RNG/CNG system was calibrated by Agility to achieve a 0.0062 g/bhp. Based on CARB’s publicly available data, this may be the lowest NOx engine ever certified. Relevant here is that CARB must

promote this new, cutting edge technology. It is incumbent on CARB to adopt a Regulation that encourages adoption of these increasingly clean trucks, so that Californians can enjoy cleaner air tomorrow, and not decades from now. Accordingly, we request that CARB modify the Regulation to remove the provision preventing low NOx trucks from being eligible for state vehicle incentive programs if they receive early sales credits, and amending the Regulation to state that additional requirements for warranty, useful life, testing, etc. do not apply to low NOx trucks until 2027.

Agility appreciates your consideration of the foregoing comments. We are happy to discuss any issue further or answer any questions.

Best regards,

A handwritten signature in blue ink that reads "Ashley Remillard". The signature is written in a cursive, flowing style.

Ashley Remillard
Vice President, Legal
Agility Fuel Solutions
ashley.remillard@agilityfs.com