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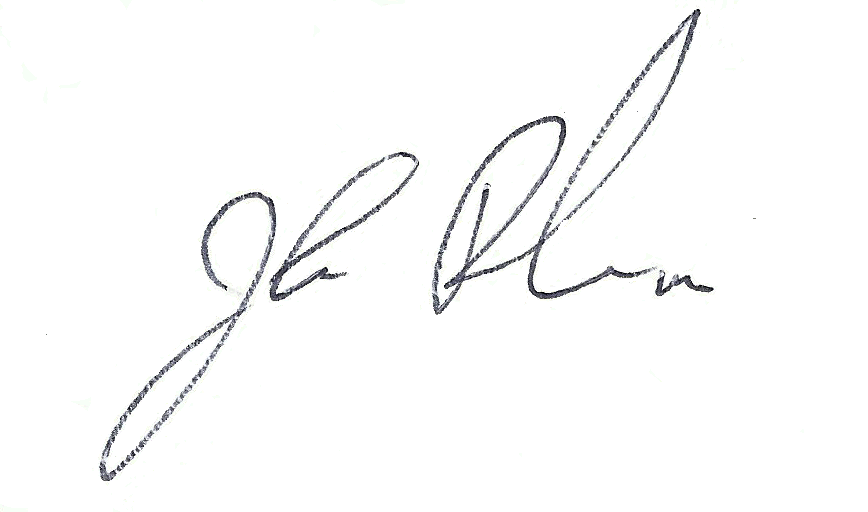
RE: ARB Technology and Fuels Assessment Workshop #1

ARB initiated the retroactive truck and bus rules and extended these rules to include off road vehicles and TRU’s because as they rightly saw, emission reduction targets were not going to be met by mandating tougher emission standards on newer engines and vehicles alone. Politically this was not a popular decision as it had significant financial implications for California small business owners, making them less competitive by increasing their costs. This was especially painful as California was well into a serious recession and we are just now beginning to recover.

While well intended, in retrospect it is apparent that there were a number of unintended consequences of this action, including the appearance of embracing diesel emission aftertreatment technology by ARB as the only available answer to the legacy fleet, either as a retrofit or in the form of a new diesel vehicle. The findings of the in-use diesel vehicle studies are a stark reminder that we cannot afford as a society to place all our eggs in one basket when it comes to reducing airborne emissions, and that alternatives to diesel are needed NOW if we are to meet the goals of the LCFS and AB32 by 2020.

I applaud ARB for engaging industry in the technology assessment process. North American Repower (NAR) looks forward to establishing a line of open communication with ARB staff to allow ARB to fully understand the extent of our technology and its ability to become an integral part of the diesel emissions solution through use of Renewable Natural Gas (RNG) as a commercial vehicle fuel. Our technology has application in the legacy fleets and TRU’s currently, and in the near future will enable new near zero emission Heavy Duty vehicles and engines to be made and sold in California.

In conjunction with one of our technology partners, McLaren Performance, NAR is currently validating these technologies are up to heavy duty commercial vehicle durability demands. This is just one aspect of the work NAR has done to create a viable pathway for the legacy diesel fleet to move to Renewable Natural Gas (RNG). Updating of the ARB Alternative Fuels Conversion regulations and passage of legislation to allow the use of RNG in vehicles in California was also part of the work that needed to be done. NAR is dedicated to creating the lowest carbon fleet right here in California, and we look forward to working with ARB to make this a reality.



Dr. John Reed, CEO

North American Repower