April 12, 2022

Liane M. Randolph,
Chair California Air Resources Board
P.O. Box 2815 Sacramento, CA 95814

RE: Hexagon Agility Comments on the RNG Imperative for California’s Transportation Sector

Chair Randolph:

On behalf of Hexagon Agility Inc. (“Agility”), I am writing to provide comments on the need to produce and use renewable natural gas (RNG or biomethane) for the California transportation sector (especially for medium- and heavy-duty on and off road applications). The California Air Resources Board (CARB) has shown that it understands that to promote a cleaner environment effectively and quickly, RNG is an essential component of the Low Carbon Fuel Standard (LCFS) program and Agility appreciates CARB’s leadership in this. Agility encourages CARB to promote RNG-operated low NOx vehicles in the CARB LCFS program in order to achieve emission reductions in the near term. In addition, Agility supports, and hereby incorporates by reference, the comments submitted by the NGV America. Agility will not repeat the points raised in that comment letter here.

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 prospective on the current clean-energy marketplace. RNG-fueled trucks remain the most widely available option to reduce GHG and NOx emissions and investing in this near-zero technology 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, RNG-operated low NOx trucks should be prominent in CARB’s strategies as an immediate pathway to a zero-emission future.

Accordingly, Agility encourages CARB to promote RNG-operated low NOx vehicles in the CARB LCFS program. Agility appreciates the time and energy CARB has spent developing and
evaluating the LCFS program and commends CARB’s work towards achieving a goal that is central to Agility’s purpose: “clean air everywhere.”

Best regards,

Ashley Remillard
Vice President, Legal and Government Affairs
Hexagon Agility