On behalf of Maas Energy Works, I would like to respectfully request that this regulation include CNG vehicles run on RNG for the following reasons:

1) Biomethane has a highly negative carbon intensity as calculated by the Air Resource Board’s Low Carbon Fuel Standard. This status means that the more biogas that is produced, the better for the environment as less methane is being released into the atmosphere helping to meet the state’s AB-32 Cap and Trade Goals, and the state’s Short Lived Climate Pollutants plan. By banning CNG bus purchases, albeit eventually, we feel the regulation sends mixed signals regarding the state’s appetite for biomethane. The Transit sector is a large consumer of fuel and fledgling RNG production in California would be stifled by a loss of this market.

2) If this regulation passes, natural gas will be required to produce electricity instead to power the vehicles. Thus the gas will be burnt anyway but now there is also a burden on the grid and power loss through the transportation of the electricity. With the passage of AB 3232 through the Assembly Natural Resources Committee there is also the very realistic potential of even greater stress on the grid with increased building electrification. Are necessary infrastructure upgrades budgeted for with this regulation?

3) Electric or Fuel Cell buses are not zero emission. We understand that they have zero tail-pipe emissions but we all understand that there are emissions from generating this electricity, not to mention the environmental impacts from manufacturing of batteries and electric vehicles. Local, renewable, natural gas should not be excluded from the state’s fuel mix.

Thank you for the opportunity to comment on this regulation. We are happy to work with ARB to improve air quality for Californians and continue to look to you for guidance and direction.

Alex Dell | RNG Sales