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Ryan Kenny
Senior Public Policy and Regulatory Affairs Advisor



August 7, 2015

The Honorable Mary Nichols, Chairman
California Air Resources Board
1101 "I" Street
Sacramento, CA 95804

Re: Comments on 50 Percent Petroleum Reduction Strategy

Dear Chairman Nichols:

On behalf of Clean Energy, I would like to respectfully express strong support for the administration's goal to reduce petroleum use by vehicles by up to 50 percent by 2030.

As North America's largest provider of natural gas transportation fuel with over seventeen years of leading industry experience, we provide construction, operation and maintenance services for refueling stations. We have a deep understanding of the growing marketplace, with a portfolio of 550 fueling stations in 43 states. In California, we have 154 with 65 being public fueling stations, all of which provide renewable natural gas (RNG) as compressed natural gas (CNG) or liquefied natural gas (LNG) vehicle fuel.

We believe natural gas, especially renewable natural gas in California, can play a critical role in achieving a 50% reduction in petroleum fuel usage by 2030. And this is true too as California looks to achieve Governor Brown's recent Executive Order B-30-15, which calls for a 40 percent reduction in overall greenhouse gas emissions below 1990 levels by 2030. **In fact, taking it a step further, we believe the ONLY way California can reach either of these goals is to incorporate renewable natural gas as a significant part of the transportation fuel mix.**

Promoting the development and use of renewable natural gas to reduce petroleum consumption will immediately begin to reduce the most significant sources of Short-Lived Climate Pollutants and toxic air contaminants, providing immediate public health and climate change benefits to the state. In fact, achieving the administration's goals would contribute significantly toward several air districts currently in non-attainment to meet stringent federal health-based standards, notably San Joaquin and South Coast.

In California, 40% of greenhouse gas emissions come from transportation, so there is a place for all technologies and transportation fuels to contribute toward meeting a 50% reduction goal in petroleum. However, a significant amount of transportation-related greenhouse gas emissions come from the use of diesel fuel, which is mostly used in heavy duty trucks. The use of both CNG and LNG as a replacement for diesel results in a 21-23% reduction in greenhouse gas emissions, respectively. If RNG is used, the greenhouse gas benefits can reach upwards of an 88% reduction compared to diesel. RNG is 100% renewable, strengthens our economy with lower fuel costs, increases our energy security, and significantly benefits our environment.

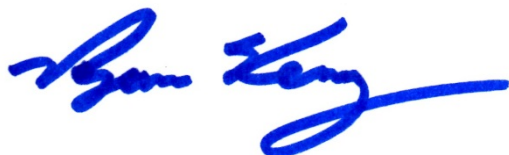
Engine technologies are developing quickly and moving toward power-plant level NO_x emissions - equivalent to the criteria pollutant emissions of electric vehicles and providing even greater greenhouse gas and SLCP reductions. In addition to the fuel for heavy duty vehicles, the world's leading natural gas engine manufacturer, Cummins Westport, Inc., has confirmed that 9L heavy duty .02 NO_x engines are due for market deployment

next year, and 12L engines due by 2018. Cleaner fuel and engines in the heavy duty space will go a long ways in reaching the state's goals of 50% less petroleum use and 40% less greenhouse gas emissions.

A 50% petroleum reduction goal is ambitious, yet realistic, to improve our environment and build California's economy. We believe natural gas and renewable natural gas as transportation fuels can make a significant contribution in meeting these goals.

Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Kenny", with a long horizontal flourish extending to the right.

Ryan Kenny
Senior Public Policy & Regulatory Affairs Advisor
Clean Energy

cc: Members, California Air Resources Board