



Chart Inc.
1 Infinity Corporate Centre
Drive, Suite 300
Garfield Heights, Ohio 44125
www.chartindustries.com

October 24, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95812
ATTN: Mr. Wes Ingram, Manager, Fuels and Evaluation Section
Mr. Chan Phan, Air Resources Engineer

RE: LCFS Program - Comments on Proposed Changes to California GREET Model

Dear Mr. Ingram and Mr. Phan,

Chart Inc. appreciates the opportunity to comment on CARB staff's proposed changes for the California GREET Model under efforts to reauthorize the Low Carbon Fuel Standard (LCFS) regulation.

Chart Inc. is the leading manufacturer of LNG fueling stations and on-board vehicle fueling equipment. For more than 20 years, Chart has provided equipment that enabled Californians to take advantage of cleaner burning natural gas. Over the past 5 years, growing demand for this technology nationally and globally has enabled Chart to increase its work force significantly. Chart employs more than 2,000 people in the US including locations in California, Colorado, Georgia, Louisiana, Minnesota, Nevada, New York, Ohio, Oklahoma, Texas, and Wisconsin.

We are writing to indicate our overall support for reauthorization of the LCFS. However, we urgently **request that CARB allow additional time for review of, and potential modifications to, its proposed changes to the CA-GREET model.** As CARB staff have made clear, methane leakage is very complex, and there is much uncertainty with existing data. Significant new data on this and other related issues should be available in the next six to twelve months. It is premature to change the carbon intensity values for natural gas (or any other fuel pathways) before that information becomes available. We, therefore, urge CARB to hold off on updating the CA GREET model in order to allow sufficient time to obtain, review and incorporate emerging, peer-reviewed information about methane leakage (roughly, six to 12 months). As we understand it, CARB can reauthorize the LCFS legislation in February 2015 without rushing to update the CA-GREET model.

The LCFS has been a positive force for alternative fuels. Chart strongly believes that it is critically important to improve the science on which this program is based. We therefore respectfully ask CARB to separate out reauthorization of the LCFS from adoption of new CI values in CA-GREET at least until the peer-reviewed data on methane leakage is available and can be fully considered.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter Murray", is written over a light blue circular stamp.

Peter Murray
General Manager – LNG Vehicle Fueling Products
Chart Inc.