

DOCKETED

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Comment Received From: Thomas Lawson

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CNGVC Supports Prioritizing Alternative Fuel as an End-Use for Renewable Gas.

Additional submitted attachment is included below.



California Natural
Gas Vehicle Coalition

November 17, 2017

The Honorable Robert Weisenmiller
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Comments on 2017 IEPR : Chapter 9 - Renewable Gas

Dear Chair Weisenmiller,

On behalf of the California Natural Gas Vehicle Coalition (CNGVC), I would like to take this opportunity to comment on the 2017 *Integrated Energy Policy Report*.

CNGVC is an association of natural gas engine manufacturers, OEMs, utilities, fuel providers, and fleet operators serving the state. We are united in the belief that wider adoption of clean-running natural gas vehicles—running on renewable gas—is key to helping California reduce greenhouse gas emissions, air pollution and petroleum dependence.

CNGVC is the natural gas vehicle (NGV) industry's premier advocacy organization in California. We support new initiatives, provide up-to-date information on NGV technology and market developments, and work with legislators and regulators to develop policies that will increase alternative fuel and vehicle use. We also advise stakeholders on testing and demonstration programs and help NGV-related businesses break into the California market.

We appreciate the California Energy Commission's recognition of renewable gas as a viable alternative fuel. Based on our insight into the industry we offer the following comments in support of prioritizing alternative fuel as an end-use for renewable gas.

1. Renewable gas used as an alternative fuel in heavy-duty trucks delivers the greatest reduction in GHG emissions and provides the most air quality benefits.

Switching heavy-duty diesel vehicles to vehicles running on renewable gas, which is 90% cleaner than diesel, is of the utmost importance in reaching California's robust air quality improvement and GHG reduction goals. Our technology is certified to the optional low standard of .02 NO_x emissions. During testing of this technology it has outperformed that certification and produced even lower emissions than that. By deploying this technology in communities with extremely poor air quality, we can give them 95 percent reductions right now in addition to the greenhouse gas reduction benefits.

We also would like to note the California Air Resources Board is going through the final stages of certifying the Cummins Westport (CWI) 11.9L engine at the .02 NOx standard, which would bring another renewable natural gas engine to market in the Spring of 2018. CWI has gone further and discontinued production of engines that are not certified at the .02 NOx standard. This translates to fleets having a Low NOx NZ engine available in the 6L, 9L, and 12L engine sizes.

2. As strong supporters of SB 1383 (Lara), CNGVC understands how using renewable gas as a transportation fuel is an important component of a statewide strategy to reduce emissions from short lived climate pollutants.

Specifically, mandating the procurement of renewable gas derived from the recycling of organic waste will help the state achieve the waste reduction targets codified by SB 1383. This will create a market pull for the recycling of organic waste through mechanisms such as anaerobic digestion. Mechanisms that should be explored could include:

- Mandated purchasing of renewable gas by municipally owned utilities as a part of their gas and energy portfolio.
- Mandated use of renewable gas in municipally owned heavy duty fleets and commercial vehicles.
- Mandating local governments to provide a preference to waste haulers using renewable gas-powered vehicles.

These policies would help drive organic waste recycling markets necessary to achieve the organic waste reduction mandates in SB 1383 and the Short-lived Climate Pollutant strategy and help decarbonize the state's economy.

3. California energy policy must support increased renewable gas production in-state

California should continue research efforts to understand the feasibility of producing more renewable gas, as transportation fuel, in-state, despite the challenges including: access to pipeline and transmission lines for distribution; renewable gas proximity to vehicle fleets and user accessibility to ultra-low-emission, heavy-duty trucks; ability of renewable gas to compete in the electricity market; and project cost and economies of scale. As demand increases for renewable gas as transportation fuel, energy policy should support robust in-state production of renewable gas.

We appreciate your consideration of our views as you deliberate this very important issue. Thank you for the opportunity to express our concerns and share our comments. Please don't hesitate to contact me if you have questions at or concerns at thomas@cngvc.org or at 888-538-7036. thomas@cngvc.org or at 916-476-7662.

Sincerely,



Thomas Lawson
President