



Natural Gas Vehicles (NGVs): The Common Sense Solution To Achieving Emissions Reduction Compliance At Low Cost and Low Risk

NGVs ideally suited to help pickups, light duty trucks reach 2025 emissions goals

- Light duty trucks face biggest compliance challenge, are critical to Big Three future
- EVs not an option – batteries too expensive, too heavy for larger vehicles
 - NGVs are proven: Ford F150, Chevy Silverado, Dodge Ram

Correcting NGV incentives is straightforward – and justified

- No consideration of NGV technology in 2016 Technical Assessment Report despite availability of abundant domestic fuel and vehicle technology
 - Game-changing Renewable Natural Gas (RNG) delivers more than 85% lifecycle emission reductions
- Restore pre-2015 “0.15 divisor” to harmonize EPA with statutory CAFE incentives,
 - Parity with EV incentives: just as EV incentives reflect renewable energy, restoring 0.15 divisor for NGVs would reflect emissions benefits of RNG (85%)
 - Would allow OEMs to easily meet 2025 targets for pickups
- Parity: eliminate arbitrary driving range requirement imposed on bi-fuel NGVs
 - Plug-in hybrids have no requirements despite much shorter electric range
- Provide NGV pickups with same emissions credits as “Strong Hybrids”
 - Eliminate minimum penetration for NGV pickup incentives: NGVs as 10% of all pickups not immediately feasible for alt fuel like natural gas

Additional opportunity for smarter regulations: encourage retrofits

- Retrofitting deployed vehicles with natural gas reduces emissions of existing fleet
- Build on NGV retrofit successes in Oklahoma, greatly expand benefits of rules
- Allow converters to receive credits based on vehicle’s remaining useful life, sell/transfer to OEMs

Restoring parity between NGVs and EVs, and between EPA and NHTSA, will provide automakers much-needed compliance flexibility for light trucks and pickups – and by making these changes effective immediately, we can start building this industry today.