

Message

From: Scott Brenner [scott@rosemontstrategies.com]
Sent: 11/28/2017 8:20:58 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Connell, Jason [Jason.Connell@nyab.com]
Subject: Guidance on locomotive emission credits. Can EPA do this or do we need a congressional action?

Good Afternoon Bill,

Congrats on your appointment. It's not easy to get through the senate, especially at EPA.

For the past year, I've been in contact with some of the people in the air office to talk about emission credits for locomotives. I represent a small company called New York Air Brake (NYAB) that makes an EPA-approved software that allows engineers to drive a train in a more fuel efficient manner. GE makes a similar technology.

EPA rules state that if a locomotive is equipped with an approved emission-reducing software at the time of manufacture, the certificate holder can claim emission credits. If the software is added one day after the locomotive is manufactured, the certificate holder cannot claim emission credits. Unfortunately for my client, we are an aftermarket product and therefore our customers cannot claim the credit.

Our largest customer, Norfolk Southern, recently announced that although they find more value in our product, the emission credits are even more valuable and therefore they will start equipping with the GE product.

Would greatly appreciate it if we could come in to walk you through the statue and our proposed solution. Our friends from Caterpillar are also affected by this interpretation. NYAB employees approximately 500 people in their manufacturing plant in Watertown, NY and the loss of Norfolk Southern as a customer would cause significant financial hardships for the company.

Thank you for your consideration.

Scott

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