



May 22, 2017

Mr. Ryan Jackson
Chairman, Regulatory Reform Task Force
Office of Policy Regulatory Reform
Mail Code 1803A
1200 Pennsylvania Ave, NW
Washington, DC 20460

RE: Evaluation of Existing Regulations, EPA-HQ-OA-2017-0190

Dear Mr. Jackson:

ANGI Energy Systems, LLC is the largest American compressed natural gas (CNG) station equipment manufacturer and has over 34 years of experience.

We believe that EPA's current greenhouse gas regulations for light-duty vehicles unfairly disadvantage NGVs, inhibiting job creation at our company and in our industry while reducing the effectiveness of the regulations in achieving their goals of emission reductions and U.S. energy independence.

We know all too well that regulatory constraints have left America lagging behind on the NGV opportunity, despite the fact that we are the world leader in natural gas production. In fact, there are over 22 million NGVs worldwide, but less than 200,000 of them are on U.S. roads. America needs to catch up for the sake of our air, our economy, and our national security, but EPA regulations need to be reformed in order to unleash this potential.

Thus, we support the comments of VNG.co, which are attached in their entirety. In particular, we would like to echo the point that EPA's decision to give greater incentives for the production of electric vehicles (EVs) compared to NGVs is based on outdated information on the relative emissions benefits of these technologies. EPA did not take into account the widespread use of BioCNG, also known as renewable natural gas (RNG), which can deliver carbon *negative* emissions performance – even greater benefits than an EV charged by renewable electricity – and already accounts for over 50% of NGV fueling in California and over 35% nationally.

Since NGVs can be as much and more of an emissions "game-changer" as EVs, they should receive equivalent regulatory incentives. This, along with other reforms recommended by VNG, would demonstrate the "pro-growth, pro-environment" philosophy of Administrator Pruitt and President Trump and do more to help America achieve our shared goals of cleaner air and energy independence.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Jason P. Lund". The signature is fluid and cursive.

Jason P. Lund
President