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Sent: 10/23/2017 7:45:52 PM
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Subject: Natural Gas Vehicles As An Alternative Compliance Pathway
Attachments: Updated VNG Comments on EPA-HQ-OAR-2015-0827.pdf; NGV Executive Action Summary.docx
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Brittany/ Drew - We want to express our great appreciation for your time today with VNG and Ariel to discuss ways to harmonize regulatory treatment of NGVs and EVs.

As we discussed, VNG is proposing regulatory changes which would address (among other segments) the light-duty truck category which accounts for 64% of new vehicle purchases (and are responsible for even greater amounts of fuel use and pollution if you take into account the differential in fuel economy between light-duty trucks and passenger cars), and for which there is not a viable electrification solution.

Natural gas vehicles provide a cost effective and additional pathway for automaker emissions compliance while preserving the products consumers desire, and are therefore worthy of being included in a portfolio of solutions along with EVs to achieve the objectives.

Specifically, we would encourage the Administration to consider:

- **Restoring the 0.15 “divisor”** in EPA’s compliance calculations, equivalent to NHTSA’s statutory Petroleum Equivalency Factor that counts a gallon-equivalent of natural gas as 0.15 gallons of gasoline. The previous Administration ended this powerful incentive while simultaneously providing electric vehicles with additional emissions incentives on the hope that EVs would be “game changers.” The game has now changed for NGVs. The shale revolution that has occurred since the current rules were set as well the development of Renewable Natural Gas as the lowest carbon vehicle fuel are true game changers that strongly justify returning to the 0.15 divisor.

The powerful and well-justified incentive of the 0.15 divisor would be complemented and made even more effective by additional changes including:

- **Eliminating range requirements on bi-fuel NGVs** that results in an impractical natural gas tank size requirement that is twice the size of the gasoline tank and costly design requirements for NGVs, whereas no such range requirements exists for hybrid electric vehicles. This is the most important regulatory change as a complement to the 0.15 divisor of the three.
- **Providing NGV pick-ups with the bonus credits** provided to “strong electric hybrid pick-ups” and **eliminating the existing minimum 10% deployment threshold** to qualify for pickup bonus credits.
- **Establishing a new incentive to encourage retrofitting existing gasoline and diesel vehicles to run on natural gas**, something that isn’t feasible for electric drives but which will reduce emissions by the existing fleet of vehicles

Enclosed for your further consideration are our Midterm Evaluation comments as well as information outlining the rationale for the recommended regulatory changes. We stand at the ready to respond to any questions or recommendations you may have with regard to our MTE recommendations and comments.

Thank you again and we look forward to continuing our dialogue with you and others engaged in the inter-agency process.

Jamie

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