

Message

From: Charles Ingebretson [CIngebretson@ajw-inc.com]
Sent: 4/25/2018 2:03:51 PM
To: Wehrum, Bill [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=33d96ae800cf43a3911d94a7130b6c41-Wehrum, Wil]
CC: Lewis, Josh [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=b22d1d3bb3f84436a524f76ab6c79d7e-JOLEWIS]
Subject: FW: Final Draft for Wehrum - v14/Final "AESI Input on NGVs for EPA 4-25-28"
Attachments: ATT00001.txt; AESI Input on NGVs for EPA 4-25-18.pdf

Bill, on behalf of the Advanced Engine Systems Institute, I am forwarding a White Paper concerning the treatment of compressed natural gas in the GHG and CAFÉ regulations for light duty vehicles.

In summary, these comments describe a new technology for CNG (involving storage of gas at lower pressures using activated carbon) and recommend three changes to level the playing field for natural gas transportation fuels: (1) eliminate the 2-to-1 fueling requirement for dual-fueled vehicles; (2) eliminate the related the related drive-to-empty requirement; and (3) restore the 0.15 multiplier for natural gas vehicles.

Again, I appreciate your consideration and would be happy to answer any questions you or your staff may have.

Regards,
Charles



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