



VIA E-EMAIL

September 2, 2021

The Honorable Liane M. Randolph
Chair California Air Resource Board
P.O. Box 2815
Sacramento, CA 95814

Re: 2022 Scoping Plan Update

Dear Ms. Randolph:

On behalf of Hexagon Agility Inc. and its subsidiaries (“Hexagon Agility”), I am writing in regard to the 2022 Scoping Plan Update. Specifically, Hexagon Agility encourages the California Air Resources Board (“CARB”) to (1) include alternative scenarios to be analyzed/ modeled as part of the Scoping Plan process, including a renewably fueled low NOx vehicles scenario; and (2) afford practical consideration to the cost effectiveness of alternative scenarios. Hexagon Agility encourages the thoughtful evaluation of the real-world consequences that would result from disregarding the points described herein. For these reasons, Hexagon Agility strongly encourages the CARB to revise the Scoping Plan process accordingly.

1. Alternative Scenarios Should Be Considered and Publicly Analyzed

Hexagon Agility is the leading global provider of highly engineered and cost-effective clean fuel solutions for medium- and heavy-duty commercial vehicles. Hexagon Agility believes there is no one-size-fits-all clean fuel solution and has adopted a multidisciplinary approach to clean energy. While Hexagon Agility’s focus has historically been natural gas, Hexagon Agility quickly adapted to the ever-changing clean-energy marketplace, introducing propane, hydrogen, and electric fuel solutions at a record-breaking pace. Today, Hexagon Agility maintains its place as an industry leader because it recognizes the benefit of healthy competition within each clean energy fuel domain.

We request that as part of the Scoping Plan process, CARB evaluate and analyze a reasonable scope of alternative scenarios, including a scenario that includes renewably fueled low NOx vehicles. Currently, it appears CARB only intends to evaluate 100% electrification. This is doing a disservice to the residents of California that deserve clean air now.

Hexagon Agility has the unique perspective of operating and selling products within all fields of the clean energy marketplace. Hexagon Agility is keenly aware of the state of that marketplace: renewably fueled low NOx heavy-duty vehicles are available, cost-effective, safe

and reliable. Indeed, Hexagon Agility has over two decades of experience with natural gas fuel systems and storage. Low NOx medium- and heavy-duty trucks using renewable fuel remain one of the most cost-effective remedies to address greenhouse gas and NOx emissions, especially in the near-term. Low NOx technologies (i.e., trucks with 0.02 gram per brake horsepower (g/bhp-hr) engines) are certified by CARB as 90 percent cleaner than diesel and are **available today** to help achieve NOx and toxic emissions goals on time. Moreover, medium- and heavy-duty low NOx trucks are only continuing to improve, with CARB recently certifying the lowest NOx engine ever. Simply put, these low NOx trucks, specifically in classes 4 through 8, are commercially available and technologically feasible and therefore should be evaluated and analyzed as part of the Scoping Plan process.

Further, as indicated in prior Scoping Plan materials, CARB will be preparing an environmental assessment under the California Environmental Quality Act (“CEQA”). In preparing this document, CARB is required to evaluate feasible alternatives to the 100% electrification option. Indeed, CARB may not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available that would substantially lessen the significant environmental effects of a project. Cal. Pub. Res. Code, § 21002. Here, CARB should evaluate an alternative that includes continued use of alternative fuels, including low NOx vehicles, in order to fully comply with its obligations under CEQA.

Analyzing and evaluating a range of alternatives that includes renewable fuels will improve transparency in the Scoping Plan process and educate the public about available and emerging technologies. It will also ensure a technology-neutral approach to the Scoping Plan analysis, ensuring that the public can adequately weigh and understand the costs/benefits of each approach.

2. Practical Cost-Effectiveness Should Be Considered

Hexagon Agility’s products have proven real-world reliability, having been used on over 60,000 commercial vehicles. Hexagon Agility has been manufacturing and servicing safe and reliable clean fuel solutions for commercial vehicle fleets and OEMs for more than 20 years, logging billions of miles on the road per year. This success and prominence in the market is due to that fact that Hexagon Agility understands that each fleet’s needs are unique, depending on its purpose and geographic region. For example, as CARB is aware, refuse trucks with predictable routes have specific cost margins and parameters, whereas high-mileage commercial fleets require entirely different cost and performance standards. Because of these diverse needs, Hexagon Agility has clear insight into the substantial financial resource limitations for the state if an electrification-only scenario is implemented.

An electrification-only scenario comes with substantial financial resource limitations for the state with it being the highest cost and highest risk option. There are faster and lower cost pathways to get closer to the Scoping Plan goals, including protecting public health. As you are aware, low NOx technologies are available today and have a proven track-record as a critical and cost-effective emissions reduction strategy. It is imperative to fully consider faster and lower cost pathways to attaining cleaner air for the public health.

Hexagon Agility appreciates your consideration of the foregoing comments. We are happy to discuss any issue further or answer any questions. We look forward to working collaboratively with CARB in order to achieve an updated Scoping Plan process that meets California's dynamic needs.

Best regards,

A handwritten signature in blue ink that reads "Ashley Remillard". The signature is written in a cursive, flowing style.

Ashley Remillard
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