



3335 Susan Street, Suite 100
Costa Mesa, CA 92626
www.agilityfuelsolutions.com
+1 949 236 5520

VIA E-EMAIL

May 28, 2020

The Honorable Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chairperson Nichols:

On behalf of Agility Fuel Solutions (“Agility”), I am writing to provide comments on the 30-day Notice of Amendments to the proposed Advanced Clean Truck (“ACT”) Regulation by the California Air Resources Board (“CARB”). Specifically, Agility encourages CARB to include heavy-duty trucks that meet a 0.02 gram NOx standard within the ACT Regulation’s definition of “near zero.” In addition, Agility supports, and hereby incorporates by reference, the comments submitted by a coalition of natural gas stakeholders on May 28, 2020, to which Agility was a signatory. Agility will not repeat the points raised in the comment letter here. Agility appreciates the time and energy CARB has spent developing and evaluating the ACT Regulation and commends CARB’s work towards achieving a goal that is central to Agility’s purpose: *“clean air everywhere.”*

Agility is the leading global provider of highly-engineered and cost-effective clean fuel solutions for medium- and heavy-duty commercial vehicles, working with original equipment manufacturers to develop products for their vehicle platforms. Agility also works with dealers and fleet operators directly to educate them about their clean fuel options, support their adoption of clean fuel vehicles, and provide ongoing customer care. Agility and its affiliates’ products include natural gas, hydrogen, and battery electric energy storage and delivery systems, Type 4 composite natural gas cylinders, propane and natural gas engine fuel systems, and propane dispensers. Agility is the most recognized brand for performance, reliability, durability, and safety of its fuel systems, as well as its engineering capabilities and superior end-to-end customer service.

Heavy-duty low NOx trucks using renewable fuel remain one of the most cost-effective remedies to address greenhouse gas (GHG) and NOx emissions, especially in the near-term. Heavy-duty low NOx technologies are certified by CARB as 90 percent cleaner than diesel and are available today to help CARB achieve NOx and toxic emissions goals on time. Amending the proposed ACT Regulation to include heavy-duty 0.02 gram low NOx trucks in the definition of “near zero” would be an important step towards improving air quality in California. Put another way, failure to include 0.02 gram low NOx trucks within the definition of “near-zero” will not result in any meaningful clean truck adoption in California in the near- to mid-term. Such an outcome should not be allowed to happen.

Agility appreciates your consideration of the foregoing comments. We are happy to discuss any issue further or answer any questions.

Best regards,

A handwritten signature in blue ink that reads "Ashley Remillard". The signature is written in a cursive style with a small flourish at the end.

Ashley Remillard
Vice President, Legal
Agility Fuel Solutions
ashley.remillard@agilityfs.com