



December 9, 2019

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

SUBMITTED VIA EMAIL

RE: Proposed Advanced Clean Trucks Regulation

Dear Chair Nichols and Commissioners:

Thank you for the opportunity to comment on the proposed Advanced Clean Trucks (ACT) Regulation. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of the rule and the policies and procedures that may emerge as a result of these discussions.

WPGA would like to align ourselves with the comments submitted a part of a coalition of organizations working to clean California's air and meet greenhouse gas emission goals. We believe the California Air Resources Board (CARB) has a tremendous opportunity to address heavy-duty truck carbon and criteria air emissions by including both zero and low-NOx truck strategies in the proposed ACT Regulation.

Heavy-duty low-NOx trucks using renewable fuel are the most cost-effective way to address GHG and NOx emissions in the transportation sector, especially in the near-term where zero emission technology remains widely unavailable. By including classes 4 through 8 low-NOx trucks that meet or beat the 0.02 g/bhp-hr NOx standard and use renewable fuel or renewable energy, greenhouse gas emissions can be reduced by 50% or more compared to diesel, the ACT Regulation—rather than only impacting 15% of the class 7 and 8 sales market by 2030—could achieve 25-50% market penetration as early as 2025 while overachieving the current projected emission reductions sought by the Regulation.

When looking toward the future, the propane industry is investing heavily in renewable propane, derived from sustainable sources like beef tallow or vegetable oil. The carbon intensity for renewable propane is on par with that of electric and including low-NOx trucks in the ACT regulation can play an important role by sending a signal to the market of the importance of in-state production of renewable propane and the continued production of low-NOx engines to help reduce greenhouse gas emissions for decades to come.

The Western Propane Gas Association appreciates your work on the ACT Regulation and looks forward to working with the Board as the State strives to reduce greenhouse gas emissions through comprehensive clean energy solutions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", is written over a white background.

Ben Granholm
Regulatory Affairs Specialist

cc: Commissioners, California Air Resources Board