May 7, 2021

Ms. Kathleen Theoharides, Chair

Transportation & Climate Initiative of the Northeast and Mid-Atlantic States

Georgetown Climate Center

600 New Jersey Avenue, NW

Washington, DC 20001

Dear Secretary Theoharides:

Clean Energy greatly appreciates the opportunity to comment on the (TCI) Draft Model Rule for the TCI-Program (TCI-P). We also applaud your dedication to this long-term effort to meaningfully address transportation sector emissions and their negative effects on both air quality and climate change.

**THE LOWEST CARBON FUEL AVAILABLE**

As North America’s largest provider of carbon negative vehicle fuel, Clean Energy is proud to deliver renewable natural gas (RNG) to the country’s leading fleets such as UPS, Waste Management, NYMTA, and Amazon. In 2020, the California Air Resources Board certified RNG as the first and only carbon negative fuel (-17.95 gCO2e/MJ[[1]](#footnote-1)), based on the weighted average under the state’s Low Carbon Fuel Standard (LCFS). Individual RNG fuel pathways have been certified with carbon intensity scores as low as -532 gCO2e/MJ[[2]](#footnote-2). It is important to note that the weighted average of battery electric power has a carbon intensity score in California of 16.6 gCO2e/MJ[[3]](#footnote-3), thereby making RNG the lowest carbon fuel available.

With similar operational performance benefits as diesel trucks, in terms or range and payload, RNG vehicles are the leading technology for reducing carbon emissions from the medium and heavy-duty vehicle sector. In addition to providing climate change benefits, vehicles powered by near-zero engines and fueled with RNG can reduce NOx emissions by 90-99 percent and eliminate diesel particulate matter emissions.

**LARGE-SCALE DEPLOYMENT CAPABLE**

Whether its mass transit buses or long-haul trucks, renewable natural gas vehicles surpass all other alternative fuels in terms of operational deployment in the heavy-duty sector. For example, in early 2021 New York MTA, the nation’s largest mass transit authority, signed a contract to fuel 800 of their buses with RNG. LA Metro, the nations’ second largest mass transit authority operates over 2,300 RNG buses and recently placed an order for 300 more. In contrast, Toronto currently operates the largest electric-battery bus fleet in North America with a total of 60 buses. While every industry has their own studies, the proof is in the deployments.

EV technology has advanced over the past decade but is still not deployable on a large-scale. This is due to cost, performance, infrastructure, and upstream energy issues that may or may not be renewable. Additionally, the lack of availability for heavy duty applications is not expected to resolve itself in the near to mid-term.

**PROVIDING RELIEF TO ENVIRONMENTAL JUSTICE COMMUNITIES NOW**

The Draft Model Rule specifically addresses environmental justice communities by mandating 35 percent of the funds collected address air quality in said neighborhoods. This is a powerful and necessary policy. Many environmental justice communities are located around heavily industrialized areas which are often plagued by heavy diesel truck traffic. Clean Energy’s vast network of over 530 refueling stations are enabling trucking fleets to provide these communities immediate and effective relief today. National trucking fleets have taken the lead in deploying thousands of RNG trucks across the country with the most recent development being Amazon’s announcement to deploy over 700 RNG trucks across its national operations. Local and regional fleets in these communities also have independently started to adopt RNG, as evidenced by our Hunts Point station in the South Bronx where small fleets such as a local concrete company utilize this green fuel.

**CONCLUSION**

TCI can be a great success if states implement a program which focuses on results by not restricting the means. Electrification is a part of the solution, but electrification alone could guarantee diesel’s domination for decades along with the associated air pollution and carbon emissions. Large-scale deployments of RNG vehicles by leading national fleets provide clear evidence that to achieve significant emissions reductions now, RNG must play a significant role in the TCI-P. We look forward to continued participation in the process and request that the TCI organization place greater emphasis on the important role that renewable fuels play in our carbon free future.

Regards,



Brett Barry

1. California Air Resources Board Low Carbon Fuel Standard Program, Certified Fuel Pathways, 3rd Quarter Data 2020 [↑](#footnote-ref-1)
2. California Air Resources Board Low Carbon Fuel Standard Program, Certified Fuel Pathways, 4th Quarter Data 2020 [↑](#footnote-ref-2)
3. California Air Resources Board Low Carbon Fuel Standard Program, Certified Fuel Pathways, 4th Quarter Data 2020 [↑](#footnote-ref-3)