



November 4, 2019

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 appreciates the opportunity to comment on the Transportation & Climate Initiative (TCI) Framework for a Draft Regional Policy Proposal. Our company is committed to reducing on-road emissions through the utilization of renewable natural gas (RNG) as a vehicle fuel.

As North America's largest provider of natural gas transportation fuel with over twenty-two years of leading industry experience, we provide construction, operation and maintenance services for refueling stations. We have a deep understanding of the growing marketplace, and our portfolio includes 533 stations in 43 states, including a significant presence in the mid-Atlantic and Northeast region.

Clean Energy supports TCI's aim to "cap emissions of carbon dioxide from the combustion of the fossil component of finished motor gasoline and on-road diesel fuel in the region." RNG is well positioned to be a key strategy in the fight to reduce on-road emissions, especially in the trucking sector. Cummins-Westport offers heavy-duty near-zero natural gas engines. These engines offer a 90-95% reduction in NOx emissions. When operated on RNG there is an added carbon emission reduction of 50 to over 100 percent. RNG is the only fuel which can be carbon negative. This is achieved by capturing fugitive emissions from agricultural waste and using it as a vehicle fuel.

Clean Energy looks forward to reviewing future details as TCI's proposal continues to be developed and I thank you for this open process.

Regards,

A handwritten signature in black ink, appearing to read "Brett Barry", written in a cursive style.

Brett Barry