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RE: NGVAmerica Comments on the New York State Draft Scoping Plan

Dear New York State Climate Action Council Members:

Natural Gas Vehicles for America (NGVAmerica) and its members commend the New York State Climate Action Council (Council) for its work in producing the Draft Scoping Plan (Plan) which recognizes the necessary role for low-carbon fuels such as bioenergy including biogas to provide both reductions in emissions while mitigating the issue of the release of methane from solid waste, municipal wastewater, and agricultural activities.

NGVAmerica, the national trade association for the natural gas vehicle industry, is comprised of 200+ companies, fleets, environmental groups, and government organizations dedicated to the development of a growing, profitable, and sustainable market for vehicles powered by biomethane or natural gas. NGVAmerica endorses strategies that support the use of zero emission vehicles (ZEV), near-zero emission vehicles and the accelerated adoption of low and net negative carbon transportation fuels such as renewable natural gas, conventional natural gas and eventually hydrogen.

There is **no one solution** to the pressing environmental issues facing the transportation sector. New York State should move quickly to deploy those technologies and solutions that are readily available, maximize cost-effective emissions reductions, and provide a real pathway to carbon neutral or carbon-negative emissions. Natural gas and biomethane are at the forefront of these solutions for New York's commercial fleets.

Using renewable natural gas for the transportation sector (especially for medium- and heavy-duty on and off-road applications) can result in net-zero carbon and even carbon-negative greenhouse gas emissions. And, when using the near zero emission engines, tailpipe emissions are virtually the same as an electric vehicle.

NGVAmerica appreciates and supports the inclusion of a clean fuel standard (CFS) in the Plan. The transportation sector is the second-largest source of greenhouse gas emissions in New York State. With a clean fuel standard, New York can build a market to aid the transition to clean fuels, reduce reliance on fossil fuels, improve public health, and help the state reach its climate goals without state tax funding.

A CFS is a technology-neutral, performance-based standard that will help New York reduce emissions from the transportation sector and reach its aggressive climate goals. Currently, New York remains 95% reliant on petroleum in transportation, consuming 6.78 billion gallons of diesel and gasoline in 2019. Adopting policies that will speed up the transportation sector's transition to cleaner fuel technologies will decarbonize the sector, including both highway and off-road vehicles and engines.

According to the Department of Environmental Conservation's integration analysis, without looking at other options it would require EV market penetration to reach 98% for light duty vehicles and 40% for medium and heavy-duty vehicles in only eight years for New York to meet its goal of reducing emissions 40% by 2030. Even under the most ambitious electrification scenario, roughly one-third of the transportation energy consumed in 2050 will still come from fossil fuels unless there is a strong push for

the use of alternative fuels. New York cannot rely on wishful thinking and unproven strategies based on consumers voluntarily scrapping relatively new vehicles to drive this unrealistic rate of EV penetration.

Instead, we need to rely on a balanced set of proven technologies to avoid relying on fossil fuels for transportation for at least the next 25 years. A Clean Fuel Standard will both accelerate electrification and promote rapid growth in low carbon liquid and gaseous fuels for those vehicle classes and in those applications where electrification is unlikely. A 2022 study for Scioto found that a 20% carbon intensity reduction CFS policy could reduce oil consumption in New York by 8-25 million barrels annually, worth between $850 million to $5.1 billion in benefits.

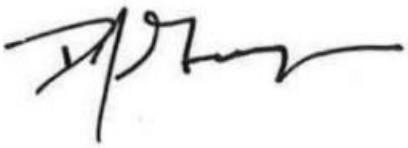
Even with the most aggressive electrification efforts, New York needs to transition to liquid and gaseous clean fuels, especially for hard to electrify sectors. In addition to the emissions reductions available through electrification, substituting lower carbon, renewable fuels will help to offset fossil fuel use and reduce harmful pollutants for combustion engine vehicles that will remain on the road for decades to come.

Clean fuels are especially important for hard to electrify sectors. Non-road fuels (including aviation) are 12% of total transportation emissions in New York. Other transportation emissions policies, like the Clean Cars and Truck Rule, will not help to decarbonize these sectors. To transition off fossil fuels, we will need investments in biofuels and green hydrogen. A clean fuel standard will help to accelerate this transition.

Your leadership on this issue is important because climate change is cumulative. The longer we wait, the harder it gets to solve. And the Plan recognizes the need to immediately employ the use of commercially available low-carbon fuels such as renewable natural gas fueling low-NOx natural gas vehicles today to achieve their proven steep emissions reductions while additional advanced technologies are developed, tested, and finally commercialized. NGVAmerica urges the Climate Action Council to focus on solutions that work today while implementing a clean fuel standard to facilitate the cleanest future possible.

Thank you for your consideration, and please contact me, or Jeff Clarke, NGVAmerica General Counsel & Regulatory Affairs Director at 202.824.7364 (jclarke@NGVAmerica.org), or Sherrie Merrow, NGVAmerica State Government Affairs Director at 303.883.5121 (smerrow@NGVAmerica.org) for additional information.

Sincerely,



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