NW Gas Association

On November 16th, The Washington Department of Ecology released its draft mitigation plan detailing the criteria they expect to use to distribute the $112.7 million available for reducing harmful NOx emissions. These dollars represent an uncommon opportunity to make significant and sustained progress in air quality. Getting this right is critical to the health and well-being of all Washingtonians.

It is the position of the Northwest Gas Association that the bias towards one technology (electrification) over others that this plan displays puts ideology ahead of the mandated goal of reducing toxic NOx emissions. Though data suggests that natural gas technology is more efficient on a dollar-for-dollar basis than their electric counterparts in transportation, we are not advocating for a one-size fits all solution that puts our technology over others. Instead, we are advocating for a system that fairly grades each proposed project on its ability to fulfill the stated goals of the VW Settlement consent decree, and maximize this investment in reducing NOx emissions. If electrification is indeed a silver bullet, as has been suggested, then let that prove itself out on an even playing field.

It has come to the attention of the NWGA that fugitive emissions are a significant concern in the adoption of NGVs in Washington. We understand this concern, and would like to address it directly. All emissions factors for transportation technologies should be graded for their environmental impact not just at the tailpipe, but on a “wells-to-wheels” perspective. This includes the marginal impact of additional electric generating load that increased EV adoption would require, as well as fugitive natural gas emissions. The NWGA already presents all NGV emissions data from a wells-to-wheels perspective based on EPA emissions data. Furthermore, the US EPA completed an inventory of US GHG emissions from 1990 to 2014. That study showed that methane emissions fell 6%, while production over that same period increased by 250%. The EPA study notes “emissions decreased from sources associated with the exploration and production of natural gas”. Our technology is clean, and is getting cleaner every day.

As a result, we remain confident that level playing field will demonstrate natural gas vehicles potential to not only be a superior technology for reducing NOx emissions, but also to make a significant impact on GHG emissions when compared to the replaced equipment.

Finally, it is important to note that addition of natural gas vehicles to Washington’s fleet mix comes with an opportunity to fuel those vehicles with renewable natural gas. Every landfill and sewage treatment plant produces RNG, but few communities make use of it. That is quickly changing as communities from around the region look to find cleaner alternatives for their waste streams. Hauling big loads using RNG to power ultra-low emitting engines could provide up to a 115% reduction in greenhouse gas emissions and a similar decrease in toxic air pollutants. If a cleaner alternative exists for running medium and heavy duty trucks, we have not yet seen it.
Improving our air quality is critical in improving the health of Washington’s citizens. The VW Settlement provides us an opportunity, and we must get it right. This is why it is so important that the Department of Ecology re-visit this mitigation plan, and create a system that impartially rewards bids and projects that will demonstrate the most efficient use of these dollars.
Thank you for the opportunity to comment, and please feel free to reach out to creiten@nwga.org with any questions.