

NW Alliance for Clean Transportation (Alex Schlay)

To whom it may concern,

The NW Alliance for Clean Transportation supports an all-of-the-above approach to fleet decarbonization. This “all-of-the-above” approach must be governed, first and foremost, by duty cycle, i.e.: Can the vehicle do the work?

In general, we take this opportunity to point out that there are many functions and truck types that cannot accommodate Battery Electric Vehicle (BEV) technology. For example, snowplows cannot accommodate BEV technology. Because in many municipalities refuse trucks double as snowplows, refuse trucks also do not lend themselves to use of BEV technology. Other truck types / duty cycles that do not recommend themselves to use of BEV technology include concrete mixers, trucks that pump out sewer mains, as well as any truck with a Gross Vehicle Weight Rating (GVWR) that is greater than 82,000 lbs. In Washington, most Class 8, over-the-road trucks operate at a GVWR of 105,500 pounds, and there is no Zero Emission Vehicle (ZEV) engine technology that may operate at a GVWR of more than 82,000 pounds.

Given the high cost of ZEVs, ZEVs’ weight & range limitations, as well as limited (\$100 million) grant dollars available through the Washington State Department of Ecology to support deployment of ZEVs, we recommend focusing ZEV-deployment efforts on Class 4 – 6 trucks vs. Class 7 & 8 trucks.

I also take this opportunity to note that Compressed Natural Gas (CNG) engine technology is proven, is clean, is inexpensive, can do the work, and can go the distance. Additionally, CNG engine technology does not require incentives to make financial sense. Finally, when trucks and buses are fueled with Renewable Natural Gas (RNG), meaningful reductions in GHG emissions are achieved. I attach a recently-published article that describes the benefits of natural gas trucking.

During recent conversations with fleets that are considering use of CNG engine technology, I get push-back that is related to concerns about fleets’ future ability to use CNG engine technology, e.g.: In 10 years. Given regulatory uncertainty, fleets are unwilling to invest in CNG vehicles and infrastructure. With this backdrop in mind, we encourage regulators to offer assurances that fleets may continue to use CNG engine technology in future when available ZEV technology cannot meet duty cycle requirements.

Thanks in advance for taking our comments onboard, and please do not hesitate to reach out with questions or concerns. We will welcome your call or e-mail, any time.