



February 24, 2017

Mr. Jordon Garfinkle
Mass. Department of Environmental Protection
One Winter Street, 7th floor
Boston, MA 02108

Re: GWSA Section 3(d) and E.O. 569

Dear Mr. Garfinkle:

The Northeast Gas Association (NGA) appreciates the opportunity to provide comments on the proposed regulations issued by the Department of Environmental Protection (DEP) in regards to Section 3(d) of the Commonwealth's Global Warming Solutions Act (GWSA) and Executive Order 569.

NGA is a non-profit trade association of natural gas companies based in Needham. Our members are the local gas distribution companies (LDCs) that serve the states of Massachusetts, Connecticut, Maine, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island and Vermont. Our members also include interstate pipeline companies that transport natural gas into the region; liquefied natural gas (LNG) suppliers; and other industry participants.

Our comments focus on achieving further greenhouse gas (GHG) emissions reductions in the transportation sector through natural gas fuel options for medium- and heavy-duty vehicles, which comprise one-half of the Commonwealth's vehicle GHG inventory.

The Commonwealth's proposed strategy for achieving emissions reductions in the transportation sector identify a greater role for electric transportation options, especially in the near-term for the state fleet. However, this strategy focuses primarily on the light-duty vehicle market - where electric vehicles (EVs) are well-suited to make inroads. While there are many EVs currently available on the market, there are virtually no EVs in the medium- and heavy-duty vehicle category. Currently medium- and heavy-duty vehicles contribute a significant portion of the emissions generated by the Commonwealth's transportation sector. This is where natural gas vehicles (NGVs) have a pivotal role in reducing GHG emissions as well as other emissions such as particulate matter (PM), carbon monoxide (CO), oxides of nitrogen (NOx), and other harmful pollutants in a cost-effective manner.

NGA recommends that the Commonwealth include a role for compressed natural gas (CNG) and liquefied natural gas (LNG) as part of the clean energy transportation sector transformation.

CNG provides efficiency, environmental and reliability benefits for a range of transportation modes but especially for heavy-duty vehicles, from buses to delivery vans to refuse trucks. CNG has fueled a portion of the bus fleet at MassPort and in the MBTA for well over a decade. CNG is a reliable and versatile fuel for the medium- and heavy-duty fleet sector. Natural gas fuels about one-fourth of all transit buses in the U.S.; furthermore, over 60% of new refuse/recycling truck orders are natural gas fueled. Expanding the use of CNG in the Commonwealth's bus and truck fleets will provide reliability, flexibility, and significantly lower emissions.

LNG provides options for heavy-duty trucking as well, particularly in long-distance trucking. Furthermore, LNG is a viable option for marine transportation modes such as water ferries and for rail transportation with use in locomotives. An example is the recent introduction of an LNG ferry in Québec, with its *MV F.-A.-Gauthier* - which is the first marine ferry in North America to operate on LNG.

We encourage DEP to consider the potential of both CNG and LNG as vehicle fuel options as part of the Commonwealth's broad strategy to accomplish a transformation of the transportation sector.

We appreciate your consideration of our comments. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Kiley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Thomas M. Kiley
President & CEO