Message

From: Tucker, Jamie [jtucker@AKINGUMP.COM]
Sent: 1/29/2018 3:11:31 PM
To: Atkinson, Emily [Atkinson.Emily@epa.gov]
CC: Feeley, Drew (Robert) [Feeley.Drew@epa.gov]; Lewis, Josh [Lewis.Josh@epa.gov]
Subject: RE: Confirmed 1/30 at 4pm: Meeting Request re: Natural Gas Vehicles
Attachments: EPA Memo 1.26.18.pdf; A Regulatory Reform Agenda for NGVs v2 (002).pdf; EPA presentation Dec 14 vF.PDF

Please find below the list of attendees for tomorrow afternoon and I've also enclosed for your use a one-pager providing a brief overview as well as separate one-pager describing the four proposed regulatory changes. Lastly, I've also enclosed a more in-depth presentation which we shared in December during a conversation with your team at OTAQ.

We are looking forward to meeting with Mr. Wehrum tomorrow and please let us know if you need any additional background in advance of the meetings.

Attending:
Robert Friedman, COO
Bob Atkinson, Chief Regulatory Officer
Larry Highbloom, Chief Administrative Officer

Susan Lent, Akin Gump
Jamie Tucker, Akin Gump

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Wednesday, January 10, 2018 8:48 AM
To: Tucker, Jamie
Cc: Feeley, Drew (Robert); Lewis, Josh
Subject: Confirmed 1/30 at 4pm: Meeting Request re: Natural Gas Vehicles

Hi Jamie,
You are confirmed for a 45 minute meeting on Tuesday, January 30, 2018 at 4:00pm with Bill Wehrum. Directions and procedures to 1200 Pennsylvania Avenue NW:

Metro: If you come by Metro get off at the Federal Triangle metro stop. Exit the metro station and go up two sets of escalators to the surface level and turn right. You will see a short staircase and wheelchair ramp leading to a set of glass doors with the EPA logo - that is the William Jefferson Clinton Federal Building, North Entrance.

Taxi: Direct the taxi to drop you off on 12th Street NW, between Constitution and Pennsylvania Avenues, at the elevator for the Federal Triangle metro stop - this is almost exactly half way between the two avenues on 12th Street NW. Facing the building with the EPA logo and American flags, walk toward the building and take the glass door on your right hand side with the escalators going down to the metro on your left – that is the North Lobby of the William Jefferson Clinton building.

Security Procedures: A government issued photo id is required to enter the building and it is suggested you arrive 15 minutes early in order to be cleared and arrive at the meeting room on time. Upon entering the lobby, the meeting attendees will be asked to pass through security and provide a photo ID for entrance. Let the guards know that you were instructed to call 202-564-7404 for a security escort.
Please send me a list of participants in advance of the meeting and feel free to contact me should you need any additional information.

Emily

Emily Atkinson
Management Analyst/Office Manager
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5412B, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

From: Tucker, Jamie [mailto:jtucker@AKINGUMP.COM]
Sent: Tuesday, January 09, 2018 3:02 PM
To: Atkinson, Emily <Atkinson.Emily@epa.gov>
Cc: Feeley, Drew (Robert) <Feeley.Drew@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Subject: RE: Meeting Request re: Natural Gas Vehicles

That's terrific and will work on our end. I will follow up shortly with a complete list of attendees on our part, but let's go ahead and book it.

Thanks.

From: Atkinson, Emily [mailto:Atkinson.Emily@epa.gov]
Sent: Tuesday, January 09, 2018 10:53 AM
To: Tucker, Jamie
Cc: Feeley, Drew (Robert); Lewis, Josh
Subject: FW: Meeting Request re: Natural Gas Vehicles

Hi Jamie,

It looks like Bill Wehrum could be available for a 45 minute meeting on Tuesday, January 30, 2018 at 4:00pm.

Please advise if this could work on your end.

Emily Atkinson
Management Analyst/Office Manager
Immediate Office of the Assistant Administrator
Office of Air and Radiation, USEPA
Room 5412B, 1200 Pennsylvania Avenue NW
Washington, DC 20460
Voice: 202-564-1850
Email: atkinson.emily@epa.gov

From: Tucker, Jamie [mailto:jtucker@AKINGUMP.COM]
Sent: Wednesday, January 03, 2018 3:21 PM
To: Atkinson, Emily <Atkinson.Emily@epa.gov>; Lewis, Josh <Lewis.Josh@epa.gov>
Cc: Feeley, Drew (Robert) <Feeley.Drew@epa.gov>
Subject: Meeting Request re: Natural Gas Vehicles

Emily/Josh - On behalf of VNG.Co, a natural gas vehicle fueling infrastructure company, we wanted to see if Assistant Administrator Wehrum would be available this month to discuss a number of administrative and legislative policy changes the company is advocating to promote the adoption of natural gas vehicles largely by leveling the playing field with electric vehicles. We have had recent conversations with the Office of Policy as well as the Office of Transportation and Air Quality to discuss these proposals as well as with staff at the White House and Department of Transportation. With Mr. Wehrum's confirmation we would like to fold him into the conversation as well.

Natural gas vehicles provide a cost effective and additional pathway for automaker emissions compliance while preserving the products' consumer appeal, and are therefore worthy of being included in a portfolio of solutions along with EVs to achieve the objectives.

Among the key advantages of the proposed regulatory changes is the benefit to achieving emissions reductions in the light-duty truck category which accounts for 64% of new vehicle purchases (and are responsible for even greater amounts of fuel use and pollution if you take into account the differential in fuel economy between light-duty trucks and passenger cars), and for which there is not a viable electrification solution.

Specifically, we would encourage the Administration to consider:

- **Restoring the 0.15 "divisor"** in EPA's compliance calculations, equivalent to NHTSA's statutory Petroleum Equivalency Factor that counts a gallon-equivalent of natural gas as 0.15 gallons of gasoline. The previous Administration ended this powerful incentive while simultaneously providing electric vehicles with additional emissions incentives on the hope that EVs would be "game changers." The game has now changed for NGVs. The shale revolution that has occurred since the current rules were set as well the development of Renewable Natural Gas as the lowest carbon vehicle fuel are true game changers that strongly justify returning to the 0.15 divisor.

The powerful and well-justified incentive of the 0.15 divisor would be complemented and made even more effective by additional changes including:

- **Eliminating range requirements on bi-fuel NGVs** that results in an impractical natural gas tank size requirement that is twice the size of the gasoline tank and costly design requirements for NGVs, whereas no such range requirements exists for hybrid electric vehicles. This is the most important regulatory change as a complement to the 0.15 divisor of the three.

- **Providing NGV pick-ups with the bonus credits** provided to "strong electric hybrid pick-ups" and **eliminating the existing minimum 10% deployment threshold** to qualify for pickup bonus credits.

- **Establishing a new incentive to encourage retrofitting existing gasoline and diesel vehicles to run on natural gas**, something that isn't feasible for electric drives but which will reduce emissions by the existing fleet of vehicles

Enclosed for your further consideration are our Midterm Evaluation comments as well as information outlining the rationale for the recommended regulatory changes.

Thank you for your consideration.

Jamie

Jamie Tucker
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