



Date: January 20, 2018  
To: Texas Commission on Environmental Quality  
From: Novus Wood Group

Re: **VW Settlement Comments and Suggestions from Freedom CNG**

Novus is a wood recycling business established in 1985 running a fleet of CNG trucks in the Houston region. We have powered our trucks on CNG since 2012, it has proven beneficial from a fuel cost prospective and we are able to do our part in cleaning up the air we breathe. We are located just south of Port Houston and get to see the dirty old drayage trucks driving through our neighborhood every day.

Natural gas enjoys proven and reliable transportation technologies **TODAY** to reduce NOx and improve air quality across the State. We have major Texas cities in ozone non-attainment status, experiencing accelerated population growth trends and more traffic is projected for the future. The sense of urgency to utilize funds for air quality improvement is paramount.

Texas can be a leader in alternative fuel adoption by simplifying the incentives process, funding vehicles fairly and prioritizing the use of VW funds for vehicles that can substantially improve air quality **TODAY** (i.e. replacing heavy duty diesel trucks). Electric vehicles are favored in this trust by funding up to 70% of cost and when operating on Texas roads, will not be required to pay a fuel road tax like CNG, LNG and propane powered vehicles. We are strongly requesting that all alternative fuels be treated equally.

We know there are over 9,000 natural gas vehicles in Texas operating daily in our cities and on our roads, not including natural gas fleet vehicles operating in the surrounding states of OK, AR, NM, LA, CO that may pass through Texas. Texas is home to over 150 natural gas stations today from Amarillo to Beaumont.

Recently our CNG trucks were tested during the Hurricane Harvey and Ice storms in Houston the uptime and reliability of CNG was uninterrupted. Underground gas delivery was unaffected during these local emergencies; back-up power generators had gas pumping at CNG stations throughout these events, while gasoline, diesel and electric supplies were interrupted. We had also read, Houston Metro and TXDOT both had similar experiences with CNG which gave them added fuel security during these events.

We respectfully request that the Commission consider prioritizing the available VW funds for heavy duty class 8 trucks, transit buses, refuse trucks, medium duty class 4-7 trucks and school buses. In the Houston area for example, this fleet segment produces 66% of the mobile emissions and only 20% of the vehicle miles driven. (HGAC annual report 2017) Utilizing the available funds in this manner provides the greatest air quality improvement for the dollars spent reducing NOx. We ask that the Commission utilize the newest Argonne AFLEET tool for measuring NOx reduction.

We ask that city and state vehicles receive special consideration for funding that will cover 100% of the incremental cost of the alternative fueled vehicle versus the traditional fueled vehicle (diesel or gasoline) for city and state heavy duty class 8 trucks, transit buses, refuse trucks, medium duty class 4-7 trucks and school buses. We believe that city and state agencies should be leaders in the effort for alternative fuel vehicle adoption and be good stewards of the environment. We at Novus are contracted by the city of Houston for wood recycling, they should require all contractors to do their part in air quality, a requirement to receive a city, or for that matter a state contract.

Finally, we ask that funding be made available for the growing used alternative fuel truck market. We have original CNG units that will be ready for retirement soon. The population of vehicles utilizing natural gas is growing in Texas and keeping lower emission vehicles operating in Texas is important. The drayage industry represents an excellent opportunity to provide owner operators currently using older high-emission diesel trucks with lower emission used natural gas vehicles. Funding should be prioritized for the replacement of old, high-emission drayage trucks with newer (used) clean burning alternative fueled vehicles.

We appreciate the opportunity to make comments and to provide you with our candid thoughts and suggestions about Natural Gas Vehicles; American, Local, Clean, Safe, Reliable, Affordable and a proven success.

Sincerely,

Roger D Oldigs  
CFO  
Novus Wood Group  
6002 Debbielou Gardens Dr  
Houston TX 77034