



October 8, 2018

Commissioner Jon Niermann
Texas Commission of Environmental Quality (TCEQ)
Implementation Grants Section, MC-204
12100 Park 35 Circle
Austin, TX 78753
ATTN: VW Settlement

Commissioner Niermann:

The Texas Natural Gas Vehicle Alliance (TXNGVA) would like to commend the TCEQ on their draft Volkswagen plan. We appreciate the Staff's hard work and consideration in developing this Plan.

The TXNGVA would like to submit the following suggestions to the draft plan:

- TXNGVA encourages more funding for Houston-Galveston and Dallas-Fort Worth areas due the proportion of vehicles across multiple counties. The Houston-Galveston and Dallas-Fort Worth areas have 19 counties together equaling to 27% of the funding while El Paso and San Antonio areas have 5 counties equaling to 48% of the funding. El Paso has had the opportunity to use TERP funding throughout the years, and they haven't. Throwing 12.79% more money toward them will not encourage usage.
- TXNGVA suggests reducing San Antonio, El Paso, and Beaumont funding amounts and disperse across the counties of the Clean Transportation Zone. This would bring in the intrastate trucking fleets that run from Laredo to Dallas Fort Worth.
- TCEQ is looking to allow vehicle usage to be 51% of the time in the affected county (TERP is 75%). TXNGVA would like to see the Clean Transportation Zone highways included in the 51% requirement.
- If the Program funds were statewide, we would clean up more emissions since these areas are never eligible for funding and VW funding may spur new interest.
- TXNGVA commends TCEQ on keeping the administrative costs to 4%, but we would like to see Houston Galveston Area Council and North Central Texas Council of Governments be third party administrators too.

- TXNGVA would like to see a greater funding emphasis on the following categories: Class 4-7 Freight, Class 8 Freight and Drayage, Class 7-8 Refuse, School Buses, Transit and Shuttle Buses.
- TXNGVA appreciates that public fleets are required to have skin in game. We are fine if it goes to 80-20 match like other programs versus 60-40 currently proposed.
- TXNGVA would like to see a greater amount of money go to alternative fuels versus "Clean Diesel." "Clean Diesel" is why we are here.
- Since fuel parity is not eligible, TXNGVA would like to see a cost per ton cap on electric vehicles to even the playing field.
- TXNGVA would like TCEQ to use the AFLEET module as an acceptable way to determine emission reductions.
- TXNGVA would like for TCEQ to streamline the application process with a limited application form.
- Finally, we hope TCEQ will write into the Program language to be able to move funding between programs and locations as needed.

We appreciate your consideration to these suggestions. If you need further information, please feel free to reach out to Susan Shifflett by phone at

Sincerely,

A handwritten signature in black ink that reads "Susan M. Shifflett". The signature is written in a cursive, flowing style.

Susan M. Shifflett
President
Texas Natural Gas Vehicle Alliance