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Sent: Monday, March 06, 2017 2:34 PM
To: VW_Mitigation_Plan
Cc: smerrow@ngvamerica.org
Subject: Input regarding DE's Draft EMT Allocation Plan

Dear DNR&EC Staff:

While I am a Maryland resident, I represent clients who operate vehicles registered in the State of Delaware and, thus, are directly impacted by DNR&EC's proposed plan regarding VW EMT funding allocation. The plan that DE has proposed should be revised to place greater emphasis on reducing NOx emissions. The present draft plan, which appears to use the ALLOWABLE reimbursement allocation percentages (verbatim) "puts a thumb on the scale" in favor of all-electric technologies over more cost-effective, more readily available and lower NOx emitting propane and natural gas vehicle technologies. For example, the plan provides private fleets with 75% of replacement cost for electric vehicles while only providing 25% for NGVs and LPGVs; furthermore, it includes funding for EVSE for those electric HD bus and trucks, further throwing money at a more expensive and LESS COST-EFFECTIVE option. The consent decree ALLOWS for these uneven reimbursements but Delaware is NOT REQUIRED to reimburse at these unfair/uneven amounts. I suggest that, for private fleets, the reimbursement/voucher for new alt fuel vehicles (electric, NGV, LPGV, H2) be EQUAL at 25% for new replacements/40% for repowers. It is not in the state's interest to be "picking winners" when establishing funding allocation guidelines.

Furthermore, I suggest that the state set a lower reimbursement/voucher for government fleets than the allowed 100%. Any fleet manager (private or public/gov't) should have "skin in the game" with a percentage of the investment coming from their own budgets. Giving govt fleets 100% will result in them becoming dependent on this type of windfall before taking affirmative steps on their own. I suggest a reimbursement/voucher system that pays govt entities 60-75% of the replacement cost with monetary caps set for different vehicles GVWs. This would allow the state to stretch the impact of its dollars and achieve greater overall NOx reductions.

HD all-electric trucks and buses cost FAR MORE than comparable natural gas-powered trucks and buses; by tipping the scale in favor of electric technologies, fewer electric vehicles will be deployed and less total NOx reductions will be realized. The DE plan, as currently written, appears to focusing more on assisting less-than-fully-commercialized electric vehicle technology than in reducing NOx, which is what the funds are being distributed to the states to achieve. Furthermore, the interests that are lobbying the state so hard for greater funding for EVs and EVSE conveniently ignore the upstream emissions of EV power. Calling PHEVs "zero emissions" vehicles is disingenuous; the total energy/emissions profile (often referred to as "well-to-wheels") should be considered. When this more comprehensive emissions analysis is used, dollar for dollar, natural gas trucks, buses and shuttles (propane shuttles too) are the most cost-effective approach to removing NOx for the least amount of money per ton of emissions removed. There's plenty of unbiased information available to the DNR&EC staff to support this approach (i.e., independent environmental studies).

Thank you for allowing me to provide input on this matter.

Respectfully Submitted,

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