Comments to the CARB Draft Proposed Concept – CNG Motor Vehicle Specifications

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August 3, 2005

Introduction

- PG&E supports CARB's objectives in providing compliance flexibility in meeting the CNG motor vehicle specifications while ensuring:
  - Existing & new technology engines are protected
  - No significant degradation in air quality occurs.
- PG&E supports the concept that the current CNG motor vehicle specifications have to move away from prescriptive gas compositional standards and instead address motor vehicle performance & emission standards.
- PG&E believes that the CPUC should be the primary lead agency in regulating natural gas quality specifications.

Comments-Performance & Compositional Specifications

- CARB proposal of statewide minimum MN 80 specification
  - PG&E agrees with this proposal.
- CARB proposal of a regional minimum MN 73 specification
  - PG&E agrees with this proposal.
- CARB proposal of "TBD" Wobbe Index specification
  - PG&E recommends that the CARB CNG spec not include a Wobbe Index spec since this appliance-related item is being addressed in the CPUC gas quality proceedings.

Comments-Performance & Compositional Specifications (cont'd)

- CARB proposal of max C4+ specification of 1.5 %
  - PG&E recommends removing this specification since the MN specification already includes the impact of the heavy hydrocarbons in the fuel's MN calculation.
  - Otherwise, this somewhat redundant spec defeats the purpose of the MN spec.
- CARB proposal of max inerts specification of 4 %
  - PG&E recommends removing this specification since it is being addressed in the CPUC gas quality proceedings.
  - Otherwise, the need for this spec needs to be substantiated.

Additional Comments

- PG&E supports the concept of granting a statewide CNG vehicle fuel spec exemptions to:
  - Light Duty CNG vehicles
  - CNG Residential Fueling Appliances
- PG&E supports research & additional testing to provide the technical basis for CARB specifications.