Comments on the CARB Draft Proposed Concept to Revise Motor Vehicle CNG Specifications

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Edwin Harte
LEV Program Manager
SDG&E/SoCalGas

Introduction

- SoCalGas and SDG&E thank CARB for considering revisions to the motor vehicle CNG specification.
- SoCalGas and SDG&E believe that natural gas is part of the clean air solution for California.
- The current CARB motor vehicle CNG specification limits gas supply options for consumers and needs to be eliminated or, at a minimum, substantially updated.
- Specifications for natural gas quality should be primarily regulated by the CPUC.
- SoCalGas and SDG&E believe CARB should:
  - Update the motor vehicle CNG specification as soon as possible;
  - Ensure the CARB rules do not inhibit the use of natural gas as a vehicle fuel, and
  - Develop a transition plan to deal with the legacy fleet.

Performance and Compositional Specifications

- CARB proposes a statewide minimum MN 80 standard
  - SoCalGas and SDG&E agree with this proposal and recommend immediate implementation of a statewide minimum MN 80 standard.
- CARB proposes a regional minimum MN 73 standard.
  - SoCalGas and SDG&E recommend a statewide minimum MN 73 standard effective on or before January 1, 2008.
  - SoCalGas and SDG&E recommend regional changes toward a minimum MN 73 standard where possible.
  - As the legacy fleet is retired or replaced with newer technologies the minimum should be reduced or eliminated as and where appropriate.

Performance and Compositional Specifications (cont'd)

- CARB proposes a "TBD" Wobbe Index standard
  - SoCalGas and SDG&E recommend that the Wobbe index not be included in the CARB rule since it is being addressed in the CPUC gas quality proceeding.
  - If necessary, SoCalGas and SDG&E recommend using a maximum Wobbe Index of 1400.
- CARB proposes a maximum C4+ standard of 1.5%
  - SoCalGas and SDG&E recommend eliminating this standard since the presence of heavy hydrocarbons is factored into the Methane Number specification.
  - Prescriptive specifications defeat the purpose of a Methane Number standard.

Performance and Compositional Specifications (cont'd)

- CARB proposes a maximum inerts standard of 4%
  - SoCalGas and SDG&E recommend eliminating this standard since it is being addressed in the CPUC gas quality proceeding.
  - If necessary, SoCalGas and SDG&E recommend using a maximum inert limit of 4%.

Additional Considerations

- A "light-duty" CNG vehicle specification
  - SoCalGas and SDG&E recommend consideration of a statewide exemption for "light duty" CNG vehicles.
- A "residential refueling facility" specification
  - SoCalGas and SDG&E recommend consideration of a statewide exemption for any "residential fueling facility".
- Engine sale restrictions
  - SoCalGas and SDG&E recommend consideration of language prohibiting the sale of CNG engines (new and used) that cannot operate on a MN 73 or lower standard.
- Engine retrofit or replacement funding
  - SoCalGas and SDG&E recommend the use of Moyer or other state funding to allow "legacy fleet" engine operators to retrofit or replace existing CNG engines.

Research Needs

- Completion of fuel specification testing for Detroit Diesel engines
  - SoCalGas has begun testing two Detroit Diesel CNG engine models (Series 50G “TK” and Series 50G “MK”) to evaluate performance on varying fuel quality.
- Development of manufacturer retrofit kits for “legacy fleet” engines existing in substantial numbers
  - Based on SWRI studies, it is estimated that $8 to 12 million would cover the costs of successful retrofit development and installation for most “legacy fleet” engines in the SoCalGas and SDG&E service territory.

Summary

- SoCalGas and SDG&E support the following:
  - An immediate statewide MN 80 standard.
  - A statewide MN 73 standard on or before January 1, 2008.
  - Eventual elimination of the CARB standard.
  - Consideration of an exemption for “light duty” vehicles and “residential refueling facilities”.
  - Language that prevents the sale of CNG engines (new or used) that cannot meet a MN 73 or lower standard.
  - Research to develop retrofit kits to allow large numbers of “legacy fleet” engines to operate on a MN 73 or lower standard.
  - Use of Moyer funding or other funding source to retrofit or replace “legacy fleet” engines so vehicles can operate on a MN 73 or lower standard.