

Dear Governor Cuomo,

The attached packet includes 53 letters of support for establishing a New York Clean Fuel Standard (CFS) from organizations including environmental advocates, agricultural groups, auto manufacturers, renewable fuel trade associations, biofuel producers, and electric charging companies. Our organizations joined the Clean Fuels NY Coalition in support of a CFS for different reasons, but we all agree on a few points.

First, a CFS would use market signals to reduce greenhouse gas emissions from the transportation sector by 20-30% in the next decade and would serve as a catalyst to accelerate the transition to clean fuel technology by both the public and private sectors. Second, these emissions reductions would cost New York State nothing except for the modest administrative costs of the program. Third, a CFS would create jobs in New York, and have knock-on effects of reducing emissions from food waste, farms and sewage treatment plants by creating a market for organic waste. Fourth, a CFS would create a new revenue stream for fleet operators like the MTA and other public transit agencies, for-hire vehicle companies, and delivery companies that are investing in clean vehicles.

Each of the letters in this packet goes into more detail about how the CFS would work and how it would benefit different aspects of the economy, public health, and the environment. We are united in our belief that a CFS is one of the lowest-cost policy tools that New York State can use to make serious progress on its transportation emission reduction goals. That is why we are respectfully asking you to include a CFS proposal, modeled on extant legislation sponsored by Assemblywoman Carrie Woerner and Senator Kevin Parker (A. 5262-A/S. 4003-A) in your Fiscal Year 2022 Executive Budget proposal. While we strongly support the climate planning process that the Climate Action Council and its advisory panels are undertaking, we cannot afford to lose two more years in the fight against climate change while waiting for adoption of the plan.

We are eager to answer any questions your staff may have about this proposal, and many members of our coalition have experience with both administering and complying with a CFS program in other states. Thank you very much for your consideration.

Sincerely,

Julie Tighe
President
New York League of Conservation Voters
On Behalf of the Clean Fuels NY Coalition





119 Washington Avenue, Suite 103
Albany, NY 12210
518.432.1405
info@aceny.org | www.aceny.org

September 14, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo :

On behalf of the Board of Directors and member companies and organizations of the Alliance for Clean Energy New York (ACE NY), I am writing to urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker). ACE NY is a member of the Clean Fuels NY coalition.

A Clean Fuel Standard would require fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

A Clean Fuel Standard is a critical tool in reducing the air pollution that contributes to asthma and other respiratory and cardiovascular diseases (which are also linked to more severe cases of coronavirus). As you know, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of greenhouse gas emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can harness the market to reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. We can and should create jobs in the installation of car chargers, sales of electric vehicles, manufacturing of electric buses, and investment in facilities to convert sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard (known in California as the Low Carbon Fuel Standard.)

Please show your support for the Clean Fuel Standard [A.5262-A (Woerner)/S.4003-A (Parker)] by including it in your Executive Budget. This policy is a proven solution to reduce transportation emissions and drive investment into new industries.

Sincerely,

Anne Reynolds
Executive Director, Alliance for Clean Energy New York

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

August 26, 2020

Dear Governor Cuomo

My name is Matt Stanberry, and I'm writing on behalf of Advanced Energy Economy (AEE), a national association of businesses spanning the advanced energy sector, including advanced transportation. As an organization whose members have expressed significant interest in this legislation, and additionally, as a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

As a national association of business leaders who are making the global energy system more secure, clean, and affordable, AEE supports a transition to a 21st-century transportation system. AEE's member companies span the transportation industry. They include manufacturers of EVs of different vehicle sizes (from small, low-speed vehicles to large heavy-duty vehicles), charging infrastructure providers, grid integration solution firms, fleet operators, and companies providing supporting technologies and software services.

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas (GHG) emissions associated with the fuels they make and sell. The standard would apply to all transportation fuel suppliers and would utilize a cap and trade mechanism whereby those who use fuels with carbon intensities higher than the set standard would generate deficits, while those who use fuels below the set standard would be issued a credit.

Under a LCFS, electricity is considered a transportation fuel and is far below the emissions standard, meaning that electric vehicle (EV) charging would generate credit revenues — for utilities and drivers — to support further vehicle and infrastructure deployment. As more EVs hit the road, the share of emissions reductions from electricity will increase. Looking at the LCFS in action in California, emissions reductions from electricity used by cars, trucks, rail lines, and even forklifts comprised a growing share of emissions reductions, rising from less than one percent in 2011 to ten percent in 2016 and in just 2016 alone, the LCFS generated \$92 million to support transportation electrification.

New York has long recognized the benefits that EVs can provide New Yorkers and society at large and has pursued a series of initiatives designed to encourage substantial deployment of EVs in the state, which an LCFS would support. These benefits include broad-based cost savings for all electric ratepayers regardless of whether they own an EV, fuel and operating cost savings for EV drivers, and enhanced economic development given the growing EV supply chain in New York and the fact that EVs will shift vehicle fuel purchasing from fossil fuels produced out of state to electricity generation increasingly produced by clean in-state resources.

Transportation electrification allows the state to pursue these benefits, while simultaneously reducing local air pollution and undertaking its most significant GHG reduction efforts in the transportation sector. Transportation is the largest emissions sector in New York State, accounting for nearly one-third of the state's greenhouse gas (GHG) emissions. With the

passage of the Climate Leadership and Community Protection Act (CLCPA), which commits New York to a 40-percent reduction in GHG emissions from 1990 levels by 2030 and an 85 percent reduction by 2050, electrification is an absolute necessity. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce GHG emissions to meet its goals.

In short, combined with other supportive EV policies, the LCFS will accelerate the deployment of EV charging infrastructure and place New York on a path to meeting its transportation electrification and emissions reductions goals at no cost to the state or taxpayers. Adopting the LCFS will allow the state to unlock the myriad of benefits that EVs provide, including bringing additional well-paying jobs to New York and cultivating an advanced energy workforce that has been affected by COVID-19.

I encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality, and drive investment in the EV sector.

Thank you for your consideration of this legislation.

Sincerely,



Matt Stanberry
Managing Director
Advanced Energy Economy



September 10, 2020

Hon. Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

The Alliance for Automotive Innovation (“Auto Innovators”)¹ represents automakers that collectively produce over 99% of the new cars and light trucks sold in the United States, automotive suppliers, and technology and other automotive companies. Auto Innovators is committed to developing and implementing policies that support a cleaner, safer, and smarter transportation future. Electric vehicles (EVs), including plug-in and hydrogen fuel cell electric vehicles will certainly play a critical role in that future. A low carbon fuel standard (LCFS) not only supports EVs but can also further reduce emissions from every vehicle on the road. Auto Innovators urges you to support a LCFS, such as is proposed by A.5262-A (Woerner) / S.4003-A (Parker).²

This is a pivotal point in the development of the EV market. Today, there are 66 electric models offered³—more than any point in history. Moreover, every major automaker has announced plans to increase EVs. In the next five years, automakers intend to offer over 100 different EV models in a variety of market segments.⁴ However, automotive industry investments alone are not enough to increase market penetration for EVs, which last year accounted for 1.98 percent of all vehicles sold nationwide and 1.43 percent of vehicles sold in New York.⁵ Increasing customer demand is necessary,

¹ Formed in 2020, the Alliance for Automotive Innovation is the singular, authoritative, and respected voice of the automotive industry. Focused on creating a safe and transformative path for sustainable industry growth, the Alliance for Automotive Innovation represents the manufacturers producing nearly 99 percent of cars and light trucks sold in the U.S. The newly established organization, a combination of the Association of Global Automakers and the Alliance of Automobile Manufacturers, is directly involved in regulatory and policy matters impacting the light-duty vehicle market across the country.

² Auto Innovators is a member of the Clean Fuels NY Coalition, who is advocating for and supporting development of an LCFS program in the state of New York.

³ *Veloz Sales Dashboard*, Veloz, <https://www.veloz.org/sales-dashboard/> (data retrieved 9/2/20)

⁴ <https://www.autonews.com/article/20181001/OEM04/181009990/nearly-100-electrified-models-slated-to-arrive-through-2022>

⁵ Data compiled by Alliance for Automotive Innovation with new registration retail and fleet data provided by IHS Markit covering January 1, 2019 - December 31, 2019.

and time and time again studies show that purchase incentives and available charging and refueling infrastructure are key to increasing customer demand. A LCFS addresses both of these.

In the context of climate change, market-based mechanisms are widely understood to encourage emissions reductions in the most efficient way, especially when broadly applied. Properly structured, a low carbon fuel program reduces the carbon intensity (CI) of gasoline and diesel fuel either directly or by funding low CI alternatives, such as plug-in and fuel cell electric vehicles and the required infrastructure to support the use of these vehicles.

We believe that a LCFS is an important part of New York's overall strategy to reduce transportation-related carbon emissions, providing an approach that aligns improved fuel economy with lower emission fuels. It can also provide a source of revenue for transportation-related investments and improvements. For example, Auto Innovators is working closely with the California Air Resources Board, utilities, and a broad stakeholder group to develop California's first point-of-purchase, statewide Clean Fuel Reward program, which utilizes revenue generated by the LCFS to create a sustainable, long-term funding source for consumer purchase incentives. Similarly, California's LCFS revenues are also being used to support fast-charging stations and hydrogen refueling stations. We look forward to working with you and other elected officials in New York to develop similar programs and at the same time implement other policies that will help facilitate our shared goal – increasing EV sales.

A LCFS is a critical component of a comprehensive low carbon transportation future that includes EVs and low carbon liquid fuels. Auto Innovators encourages you to support A.5262-A (Woerner) / S.4003-A (Parker).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Bozzella". The signature is fluid and cursive, with the first name "John" written in a larger, more prominent script than the last name "Bozzella".

John Bozzella
President & CEO



46280 Dylan Drive, Suite 200, Novi, MI 48377 - (248) 380-3920
2999 Judge Road, Oakfield, NY 14125 - (585) 948-8580

July 23, 2020

Dear Governor Cuomo:

My name is Richard DiGia and I'm writing on behalf of Aria Energy LLC, one of the largest renewable energy companies in the US. We currently have 11 renewable energy projects and an office in New York. As a business owner in New York and a member of the Clean Fuels NY Coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

In the last year Aria has spent over \$37 million dollars in local communities where our renewable projects are located in New York. These projects also paid annually close to \$1 million in local taxes. All eleven of our renewable projects employ NY based employees, vendors and consultants. Adopting an LCFS in New York will allow Aria to continue to grow its renewable business in the state.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases, which are linked to more severe cases of Coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expanding the electric



46280 Dylan Drive, Suite 200, Novi, MI 48377 - (248) 380-3920
2999 Judge Road, Oakfield, NY 14125 - (585) 948-8580

vehicle network to converting sewage, farm and food waste to clean, renewable fuels. By way of example the California LCFS has created over 38,000 jobs since being enacted.

I encourage you to show your support for the Low Carbon Fuel Standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in blue ink that reads "Richard DiGia". The signature is written in a cursive, flowing style.

Richard DiGia
President & CEO
Aria Energy LLC

May 27, 2020

Dear Governor Cuomo,

Attis Innovations, LLC is a biofuel and bioproducts producer with an operational asset located in Fulton, NY. Our facility in New York employs 85 people and produces 80 million gallons of renewable ethanol per year, roughly 15% of the state's demand. Attis has [ambitious plans](#) to expand new advanced biofuel operations throughout the state to meet New York's growing need for low carbon transportation solutions but is unable to move forward without definitive policies from the state that ensure increased market access for renewable fuels. This is why we ask for your support of the Low Carbon Fuel Standard (LCFS), as proposed in A.5262-A (Woerner)/S.4003-A (Parker), in the 2020 legislative session.

Attis has joined the Clean Fuels New York Coalition along with the New York League of Conservation Voters, American Lung Association, and various clean energy producers and environmental advocates to encourage the state's adoption of an LCFS. The LCFS is a budget-neutral and technology-neutral policy mechanism to reduce greenhouse gas (GHG) emissions from the transportation sector as required under the Climate Leadership and Community Protection Act (CLCPA).

New York's transportation sector is the largest emitter of greenhouse gases (GHGs) in the state accounting for 35% of emissions while costing motorists \$14 billion per year in fuel expenses, almost entirely from fossil fuel imports. The LCFS would set an incremental goal of reducing transportation emissions 20% by 2030. The technology-neutral characteristic of the policy allows reductions to come in many forms: lower fuel consumption due to increased vehicle efficiency or adoption of electric vehicles (EVs), increased blending of low-carbon biofuels, usage of renewable natural gas or any other alternative fuels that emit fewer emissions than gasoline.

There are many producers of low-carbon fuels in the U.S., but they are shipping their products to states such as California, Oregon, and British Columbia where their fuels receive a premium under Low Carbon Fuel Standards. If New York wishes to tackle its transportation emissions problem, it must enact similar legislation to attract renewable fuel producers. Since California enacted an LCFS in 2011, private companies have invested over \$2 billion in the state and created over 20,000 jobs. New York can expect similar results and divert the billions of dollars currently used on fossil fuel imports to in-state production of low-carbon fuels.

While the LCFS will undoubtedly incentivize greater adoption of EVs, resulting emissions reductions will have a considerable lag period. Most motorists will continue to use internal combustion engines (ICEs) for decades—the higher blending of low-carbon fuels is the only way to start reducing emissions immediately. Attis is poised to produce such fuels 100% in-state, so long as the LCFS is established to create a profitable market.

Full deployment of Attis' biorefining capabilities in New York could increase farm revenue by \$1 billion while generating 1 billion gallons of renewable fuel for New York motorists. Attis' technology converts energy crops and waste biomass into cellulosic ethanol with up to 125% fewer lifecycle emissions than gasoline. However, without an LCFS policy in place, fuel distributors have no incentive to buy and blend these fuels hindering Attis' ability to expand our operations from one facility in Fulton to potentially 50 throughout the state.

Attis would partner with numerous New York landowners and farmers who would be significant beneficiaries of the LCFS and expanded biofuel production. SUNY ESF has identified 1.7 million acres of underutilized cropland in New York that would be suitable for energy crops such as willow. The university predicts landowners could see a [10-20% IRR](#) when planting short-rotation willow for renewable fuel production and create about 60 jobs per 10,000 acres planted.

SUNY ESF, Cornell, and 20 other universities have extensively studied the use of willow as an energy crop. The New York climate is conducive to the fast-growing trees, and SUNY currently operates over 1,000 acres for testing purposes—it is well-vetted and ready to be planted by farmers looking for additional income without much maintenance. The crop is harvested once every 3-years and has been shown to be profitable on as little as 25 acres of land. Attis’ biorefineries can also run on logging residues and other agricultural wastes creating many opportunities for new revenue streams throughout New York’s agricultural industries.

The enactment of the LCFS will not only spur investment and innovation in the agricultural sector but position New York as a leader in the production of advanced low-carbon durable materials. Attis’ biobased byproducts can be further refined into bioplastics, carbon fiber, and green chemicals. Each biorefinery can support additional downstream manufacturing jobs that will produce materials for automotive, construction, and consumer product industries creating thousands of direct jobs.

Attis believes the LCFS offers the greatest policy certainty for emission reductions in the transportation sector while ensuring market access for all carbon reduction technologies. Biofuels particularly have difficulty getting to consumers under the current market structure as they rely on blending with fossil fuels. However, the LCFS creates a mechanism in which higher blending rates are encouraged alongside the transition to EVs, resulting in low cost and flexible compliance with the state’s carbon reduction goals. As seen below, Attis’ New York willow cellulosic ethanol can significantly reduce emissions from traditional internal combustion engine vehicles.

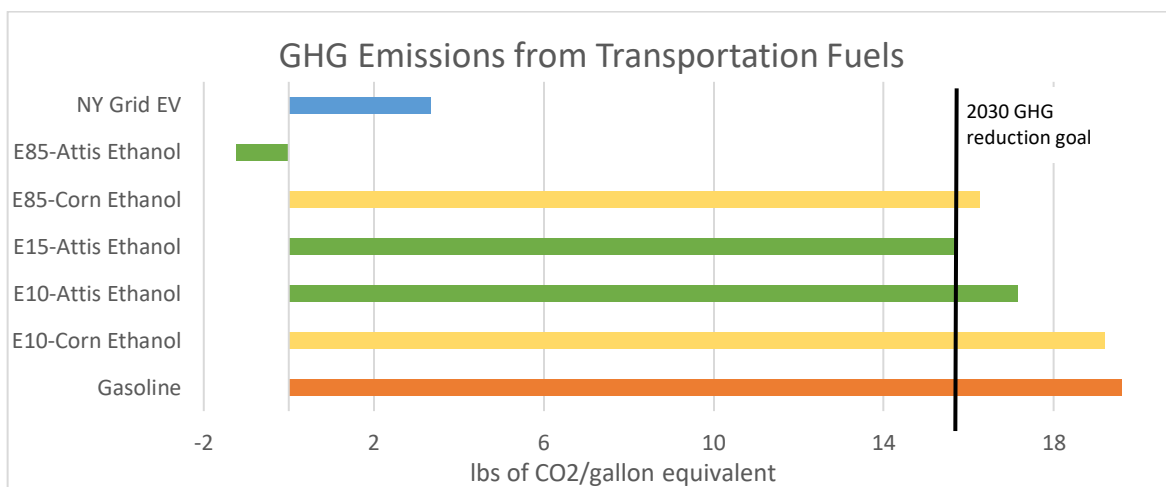


Figure 1. demonstrates the GHG emissions from liquid transportation fuels blending at various levels. E10 means 90% gasoline and 10% ethanol, E15 means 85% gasoline and 15% ethanol, E85 means 15% gasoline and 85% ethanol. Currently, motorists consume an E10 blend, but all vehicles produced after 2001 are approved to consume E15. Flex-fuel vehicles can consume blends up to E85.

Traditional corn-ethanol alone will not help New York reach its climate goals; but, a healthy mixture of EVs, renewable diesel/gas, and cellulosic ethanol will allow for a low-cost yet significant transition to a greener economy. The LCFS has proven effective in California, Oregon, and British Columbia and can provide considerable economic stimulus to New York. As Canada moves to enact a country-wide LCFS in 2022 as well as



several midwestern states, New York will have a hard time attracting low-carbon fuels without an LCFS in place and thus fall short of goals set out in the CLCPA.

As the largest biofuel producer in New York with the ambition and technological ability to grow 50-fold, we strongly encourage you to support the LCFS in the upcoming legislative session. Of all the carbon reduction policies floated, we believe only the LCFS ensures a stable market environment for biofuels allowing for the rapid expansion of Attis' biorefineries throughout the state. A bipartisan goal all lawmakers can support is keeping New Yorkers' money within the state by replacing fossil fuel imports with home-grown biofuels. The positive economic implications for farmers, loggers, truckers, skilled and unskilled laborers, and New York motorists are substantial and why we ask for your support.

Sincerely,
Jeff Cosman, CEO of Attis Industries Inc.

To learn more about Attis' technology and expansion plans in New York, visit <https://youtu.be/djnJXAQ-8PU>.

BAE Systems
Electronic Systems
1098 Clark Street
Endicott, NY 13760
Telephone: 607.770.2732

BAE SYSTEMS

September 21, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

The Hon. Governor Cuomo:

On behalf of BAE Systems, and as a member of the Clean Fuels NY coalition, I am asking for you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

Last year's Climate Leadership and Community Protection Act (CLCPA) outlined environmental goals which a Clean Fuel Standard would help achieve. CLCPA's mandates for a 40% reduction in greenhouse gas (GHG) emissions by 2030 and an 85% reduction in GHG emissions by 2050 would be well served by a Clean Fuel Standard.

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. It is a critical tool in reducing criteria pollutants in our air that contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50% of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, and renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

Transportation is New York's largest source of GHG emissions — approximately 35% and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

September 21, 2020
The Honorable Andrew M. Cuomo
Governor of New York State
Page 2 of 2

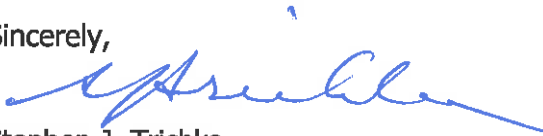
Adopting a Clean Fuel Standard in New York would benefit BAE Systems' transit and transportation advanced technologies businesses as well. BAE Systems is the trans-Atlantic leader in heavy-duty electric hybrid and electric propulsion with over 12,000 transit buses in daily service across 80 leading sustainable cities including New York City, Paris, London, San Francisco, Toronto, Seattle, Montreal and Boston. Nearly 1,400 BAE Systems employees work at our Endicott N.Y. campus. This workforce injects \$200 million into the local Southern Tier economy each year.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Thank you in advance for your time and consideration.

Sincerely,



Stephen J. Trichka
Vice President and General Manager, Power & Propulsion Solutions
BAE Systems
stephen.trichka@baesystems.com
607-770-2732



July 15, 2020

Dear Governor Cuomo:

My name is Marty Ryan and I'm writing on behalf of BerQ RNG USA, Inc. ("BerQ") BerQ is currently developing two renewable natural gas projects on dairy farms located in New York and a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will accelerate the ability to develop additional RNG projects in the state of New York generating additional direct employment on the dairy farm project site as well as indirect jobs installing and constructing the projects and providing continued service for projects that typically extend beyond 20 years. Each of these projects provides significant economic impact to the dairy farm owner and provides a viable beneficial use for manure that otherwise is creating harmful greenhouse gasses being emitted into the atmosphere. Each RNG project results in a new capital investments in New York of \$5 million to \$10 million and the passage of an LCFS would allow BerQ to aggressively pursue additional opportunities within New York in the next several years. Currently BerQ plans to sell the RNG produced by the 2 projects in New York to buyers with fuel dispensing capacity in California to take advantage of that state's LCFS program but having an LCFS in New York would allow BerQ to sell the RNG in the same service territory as the projects are located in providing the pipeline companies in New York with a means to decarbonize their pipeline system and provide RNG to additional fuel dispensing stations that would be built to accommodate the increase in demand as a result of an LCFS in New York.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation

fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

I encourage you to show your support for the low carbon fuel standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Thank you for consideration and attention to this important matter. Please feel free to contact me with any questions you or your staff may have at (412) 656-8863 or marty@berqrng.com.

Sincerely,



Martin Ryan
Senior Executive Vice President & Chief Legal Officer
BerQ RNG USA, Inc.



The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo,

The Biotechnology Innovation Organization (BIO) urges you to support Assembly bill A.5262-A and Senate bill S.4003-A, creating a clean fuel standard (CFS) for New York.

BIO is the world's largest biotech trade organization representing over a thousand innovative companies that span from sustainable fuels to biopharmaceuticals. We are dedicated to the advancement of policies that support and foster the creation of a resilient and robust bioeconomy. We believe that biotechnology offers solutions to address a wide variety of environmental and human health challenges that are present today, and those that will be amplified tomorrow as climate change bears down upon us.

Petroleum use in transportation is the largest source of greenhouse gas (GHG) emissions in New York, accounting for over 35% of total GHG emissions.¹ Petroleum-based fuels also represent a significant portion of New York's harmful air pollution, the majority of which occurs in predominantly low income and minority communities.² According to the American Lung Association's annual State of the Air Report, more than 4 in 10 New Yorkers live in areas with failing air quality.³ Cities and states will need to implement targeted policy to reduce transportation emissions. Transportation is one of the most notoriously difficult sectors to decarbonize. While programs like RGGI can be effective in reducing stationary emissions, GHG emissions and criteria pollutants from transport are generally left unabated under those policies. It is critically important that a New York CFS recognizes the GHG and air quality benefits that advanced biofuels can bring today. These sustainable fuels are available to immediately displace petroleum, avoiding heat trapping emissions which if released will cause heating for the next 100 years. Furthermore, advanced biofuels, including SAF will be critical in the near- and long-term for hard to decarbonize sectors like aviation, shipping, and heavy-duty transportation. Creating a technology neutral marketplace which is inclusive of all sustainable fuels and forms of mobility will ensure that New Yorkers will receive the immediate reductions in GHG emissions and harmful air pollution, while allowing for a clear transition to zero- and near-zero emission vehicles. A made in New York CFS can address these emissions by making the polluters responsible for procuring and deploying ever cleaner forms of mobility, which will help support a just transition to a cleaner society.

A CFS allows New York to build on its existing biosciences sector which is comprised of 4,147 business that employ almost 90,000 people at an average salary of more than \$99,314. In recent years there was at least \$19.5 million bioscience-related venture capital investments specific to biofuels.

¹ <https://www.nyserda.ny.gov/-/media/Files/EDPPP/Energy-Prices/Energy-Statistics/greenhouse-gas-inventory-fact-sheet.pdf>

² <http://a816-dohbesp.nyc.gov/IndicatorPublic/Traffic/index.html>

³ <https://www.lung.org/media/press-releases/state-of-the-air-new-york>



Establishing an CFS in New York State would send a clear signal that New York is ready to lead the Northeast in creating a cleaner, healthier transportation system. It would reaffirm the state's position as a leader in reducing the environmental and health impacts associated with fossil fuel use. A state CFS will provide economic, environmental, and health benefits without impacting consumers at the pump or incurring significant administrative costs. We have already seen the success in other states:

With a clean fuel standard...

- The American Lung Association modeled a savings of \$4.3 million dollars in public health costs between 2010-2020 as a result of California's low carbon fuel standard (LCFS) and Cap and Trade policies.⁴
- Following full adoption and implementation of its CFS in 2016, Oregon reduced over 4 million metric tons of greenhouse gases in two years.⁵ With an LCFS, California has reduced 61 million metric tons climate change inducing greenhouse gases since 2011.⁶

A clean fuel standard would...

- Position New York as the east coast's most appealing location for innovative, low-carbon fuel companies to develop and deploy sustainable fuels and technology.
- Spur investment and create high-paying, resilient biotech jobs.
- Provide new, value-added outlets for forest residues, municipal solid waste, manure, and other locally generated wastes.
- Increase economic growth, generating more revenue to fund the programs and projects important to New Yorkers who want a cleaner, healthier environment.

We urge you to include a clean fuel standard in the State budget and make New York the leader in building a cleaner, healthier, and more equitable transportation system.

Sincerely,

A handwritten signature in black ink that reads "Stephanie Batchelor".

Stephanie Batchelor

Vice President
Industrial and Environmental Section
Biotechnology Innovation Organization (BIO)

⁴ https://www.edf.org/sites/default/files/content/edf_driving_california_forward.pdf

⁵ <https://www.oregon.gov/deg/aq/programs/Pages/Clean-Fuels-Data.aspx>

⁶ <https://ww3.arb.ca.gov/fuels/lcfs/dashboard/dashboard.htm>



BTR Energy

BTR Energy
1015 15th Street NW, Suite 1025
Washington, D.C. 20005

September 14, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

I am writing on behalf of BTR Energy, a member of the Clean Fuels NY Coalition, in support of a Low Carbon Fuel Standard as proposed by A.5262-A (Woerner)/S.4003-A (Parker). Our company works with electric vehicle manufacturers, EV fleet operators and renewable energy producers to manage all data collection, reporting, and credit generation in similar state programs.

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce greenhouse gas emissions associated with the fuels they make and sell.

LCFS programs support the electric transportation sector by incentivizing renewable electricity used as a transportation fuel for electric vehicle charging, and they help accelerate the adoption of electric vehicles through expanded charging networks and investments in utility customer programs. An LCFS can also result in the direct investment of electrification projects, EV charging infrastructure, point of sale rebates, and education programs to inform the public of the benefits of EV transportation.

In California, the LCFS has also driven market investment towards new renewable sources of grid-connected electricity that have a lower carbon intensity than the State's average grid electricity. These projects include solar, wind, fuel cell, and also biogas to electricity projects in the agricultural sector. This enables electric vehicles to charge at residential and public charging locations with renewable, state-based power and achieve zero or even negative lifecycle carbon emissions.

Adopting an LCFS in New York is a powerful climate action tool to help reduce GHG emissions and also criteria pollutants among the transportation sector. An LCFS can support measurable and predictable emission reduction targets while helping achieve other important policy goals, such as expanding EV ownership.

I encourage you to show your support for a market-based clean fuels program by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions while encouraging new investments in electric transportation.

Sincerely,

Ashley P. Beaty
Vice President, Partnerships & Public Policy
BTR Energy



Submitted via email to jtighe@nylcv.org

September 8, 2020

C/o Julie Tighe
President
New York League of Conservation Voters

Re: NY CLEAN FUEL STANDARD SUPPORT LETTER

Dear Governor Cuomo,

My name is Aaron Gillmore, and I'm writing on behalf of BYD Motors, LLC ("BYD"). As a business that is hoping to grow our New York operations and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

BYD's unique combination of battery development and electric truck experience is now revolutionizing every aspect of clean transportation, with a vertically integrated zero-emission product line, including solar power generation, energy storage, and transportation applications such as buses, forklifts, cars and trucks. Our mission is to design, build and support a true zero-emission energy ecosystem with zero-emission power generation, electrical energy storage, and end-use applications.

Adopting a Clean Fuel Standard will help BYD support New York in achieving broad, multi-sector deployments of zero-emission, commercial electric trucks, which will reduce near- and long-term mobile source emissions in communities that bear a disproportionate share of the state's air pollution burden and associated negative health consequences. BYD believes political leadership, innovative incentive programs, and investable revenue streams such as the Clean Fuel Standard proposed are critical to achieving more favorable upfront economics that will increase investment, push manufacturers down the cost v. volume curves, and provide New York with a market leading opportunity to accelerate the electrification of the trucking sector.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.



Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Gillmore".

Aaron Gillmore
Vice President
BYD Motors, LLC



August 20, 2020

The Honorable Andrew M. Cuomo
Governor of the State of New York
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

**Clean Transportation
Technologies and Solutions**

www.calstart.org

Board of Directors

Mr. John Boesel
CALSTART

Mr. Jack Broadbent
Bay Area Air Quality
Management District

Ms. Nicole Faulk
Georgia Power

Ms. Dawn Fenton
Volvo

Mr. Yuri Freedman
Southern California Gas
Company

Ms. Karen Hamberg
Westport Fuel Systems

Ms. Colleen Jansen
ChargePoint

Mr. Wayne Natri
South Coast Air Quality
Management District

Mr. Scott Phillippi
United Parcel Service

Ms. Katie Sloan
Southern California Edison

Mr. Chris Stoddart
New Flyer of America

Mr. Stephen Trichka
BAE Systems

Ms. Cynthia Williams
Ford Motor Company

I'm writing on behalf of CALSTART, a leading national clean transportation non-profit with our Northeast Regional Office based in Brooklyn. As an organization with a presence in New York and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, proposed by A.5262-A (Woerner)/S.4003-A (Parker). A Clean Fuel Standard is technology-neutral and performance-based, requiring fuel producers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers, while generating high-quality, living-wage blue-collar jobs that cannot be outsourced to other states.

Transportation is New York's largest source of greenhouse gas emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and keeping revenues in New York.

As we have seen successfully in other states such as California, Oregon and Colorado, adopting a Clean Fuel Standard will accelerate investment in New York by CALSTART member companies such as vehicle manufacturers, clean fuel providers, EV charging companies. Adopting such a standard will also make purchasing a zero or near-zero emission vehicle more appealing and cost-effective for large public and private vehicle fleets, because they would earn revenues every year from their use of alternative fuels, thus dramatically increasing the likelihood that New York can achieve our zero-emission vehicle and infrastructure goals, along with our climate targets.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York supported by clean transportation investment. There is immense economic potential for the production and use of low-carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of that state's Low-Carbon Fuel Standard, with another 50,000 jobs in clean vehicle manufacturing supported by this source of revenue for the users of clean vehicles. We expect that with this increased investment and energy, we will also be enabled to engage our members much more in New York and CALSTART hopes to add additional full-time staff here.

I encourage you to show your support for the Clean Fuel Standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce

OFFICES IN :

48 S. Chester Ave PASADENA, CA 91106 | 1607 Cole Blvd. LAKEWOOD, CO 80401 | 67 35th St. 3rd floor Ste C356 BROOKLYN, NY 11232 | 510 W. Kearney Blvd Suite 105
FRESNO CA 93706 | 2600 Tenth Street, Suite 407, BERKELEY, CA 94710 | 200 E. Big Beaver TROY, MI 48083 | 5000 S. Airport Way, Ste 208 STOCKTON, CA 95206



transportation emissions, improve air quality and drive investment into new industries and would be a boon for New York.

Sincerely,

Benjamin H. Mandel
Northeast Regional Director
CALSTART
67 35th Street, 3rd Floor, Suite C356
Brooklyn, NY 11232
(929) 295-6540
bmandel@calstart.org

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

June 17, 2020

Dear Governor Cuomo,

I am writing on behalf of ChargePoint, the world's largest network of electric vehicle (EV) charging stations. As a business looking to accelerate private investment in EV charging infrastructure and sustainable transportation solutions in New York, and a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard (LCFS), such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

An LCFS is a technology-neutral, performance-based standard that requires fossil fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they produce and sell in New York. It also supports low-carbon, alternative fuels, like electricity and hydrogen, and low-carbon fuel infrastructure providers. Given New York's unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and decarbonize its transportation sector at no cost to the state.

Adopting an LCFS would vastly improve EV charging station economics, thereby attracting private investment and accelerating infrastructure deployment in the state. Today, a lack of EV charging stations across the state as well as outdated electricity rates for Direct Current (DC) fast charging stations are hamstringing private investment in EV charging and discouraging EV adoption in New York. Adding LCFS revenues to a station's investment profile can reduce station payback periods by as much as half (as we have seen in California, where a similar program is in place), which can be the difference in a station being built or not.

An LCFS is also a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing – and the majority of these emissions come from light-duty cars and trucks. Because of this, it is critical that a future LCFS covers the light-duty vehicle segment, otherwise a significant opportunity to reduce emissions and transition New Yorkers towards lower carbon fuels will be lost. An LCFS incentivizes the production and use of lower carbon fuels among all vehicle classes and enables drivers to save money on fuel costs. An LCFS also creates in-state jobs, supports regional economic development, and reduces out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across the state. New York is particularly well positioned to benefit from the economic potential posed by the use of low-carbon fuels in New York, from jobs to expand the

EV network to converting refuse, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created because of the LCFS, and a burgeoning low-carbon fuel industry has emerged around the program.

I encourage you to show your support for the low carbon fuel standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,



Evan Neyland
Manager, Public Policy
ChargePoint

Clean Communities of Central New York

727 E. Washington Street

Syracuse, NY 13244

Phone: (315) 278-2061 ; www.ccofcny.com

Email: Coordinator@ccofcny.com

Executive Director: Barry P. Carr



Dear Governor Cuomo

My name is Barry Carr, and I am the Executive Director of Clean Communities of CNY. We are an education/outreach program, funded by the US Department of Energy to advance Clean and Advanced Transportation Technologies. We are also a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. New York State has been a leader in the use of alternative fuels over the 25 years of our existence, and I believe that enacting the Clean Fuel Standard will increase our leadership, improve our environment, and benefit the state economically.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Clean Communities of CNY, serving Upstate NY has managed a federal investment of over 13 Million in electric, renewable natural gas, biodiesel, and ethanol infrastructure. We believe that a Clean Fuel Standard could rapidly expand the necessary infrastructure to meet the State of NY's aggressive clean transportation goals.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation

emissions in New York, improve air quality and drive investment into new industries. This effort will benefit current and future residents of NYS; and we appreciate your support.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. Carr".

**Barry P. Carr, Executive Director
Clean Communities of CNY**



July 27, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

RE: Enacting a Low Carbon Fuel Standard (LCFS)

Dear Governor Cuomo,

I'm writing on behalf of Clean Energy, North America's largest provider of renewable natural gas as a transportation fuel. As a business with significant operations in New York, including over a dozen vehicle refueling stations, and a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to

converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

I encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brett Barry".

Brett Barry



July 9, 2020

RE: Low Carbon Fuel Standard Program - SUPPORT

Dear Governor Cuomo,

The Coalition for Renewable Natural Gas (RNG Coalition) writes to express our strong **SUPPORT** for the adoption of a Low Carbon Fuel Standard in New York such as the program proposed by A.5262-A (Woerner)/S.4003-A (Parker).

The RNG Coalition is a non-profit organization that represents and provides public policy advocacy for the renewable natural gas industry across North America. Our organization is comprised of over 235 members from leading companies operating in each sector of the industry, including but not limited to producers of greater than 98% of all Renewable Natural Gas (RNG or biomethane) produced in the United States and Canada.

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

The adoption of an LCFS program in New York would provide the state with an excellent opportunity to decarbonize the economy and simultaneously improve environmental quality, foster improved management of waste streams, improve energy security, diversify our fuel supply and grow New York's clean energy economy by generating demand for RNG. According to the National Renewable Energy Laboratory (NREL), New York ranks 7th in biomethane development potential in the nation.¹ The development of RNG production facilities in New York would improve management of organic waste streams – and thereby reduce the air, soil, and water impacts of that waste. RNG projects also provide substantial

¹ <https://www.nrel.gov/docs/fy14osti/60178.pdf>

economic benefits. According to a study conducted by ICF, RNG facilities attract between \$10-\$100 million in capital investment per project and the creation of up to 173 direct and indirect jobs per project.²

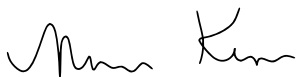
An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

We encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,



Nina Kapoor Oliveira
Director of State Government Affairs
Coalition for Renewable Natural Gas
Nina@RNGCoalition.com

²https://static1.squarespace.com/static/53a09c47e4b050b5ad5bf4f5/t/59077544ebbd1ad192d13ff6/1493660998766/ICF_RNG+Jobs+Study_FINAL+with+infographic.pdf



The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

September 9, 2020

Dear Governor Cuomo,

The Deutsche Post – DHL Group is a global leader in logistics and delivery services, providing essential delivery services of PPE, medicines, and basic life needs to people throughout the Empire State and across the United States. Our 52,000 employees and associates in the U.S. – part of our 550,000 employees globally – include four divisions, all present in state of New York.

As part of our substantial operations in the state, DHL has been a leader in sustainability with green fleets, electric charging stations and energy efficient buildings. As such, we have been a supporter of the Clean Fuels NY coalition, which we see as an important part of our efforts to reduce carbon emissions and transition our large and diverse fleet to zero emission vehicles. Through this coalition, DHL strongly encourages you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker) currently pending in the legislature. A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

The adoption of a clean fuel standard in New York would be a significant step in the right direction and would also support our corporate goal of being a net zero carbon emissions company by 2050. Having witnessed the adoption of the low carbon fuel standard in California more than a decade ago, DHL has seen first-hand, how such a policy can transform the market for transportation fuels. By working to reduce the carbon intensity of transportation fuels through the adoption of a regulatory target, market forces are now determining the most efficient way to stay below the established targets and helping to reduce carbon emissions in significant ways. The credit based market mechanism has leveled the playing field for fleets and accelerated the adoption of low emission technologies for a variety of formerly fossil powered fleet equipment, from material handling equipment to heavy duty trucks. Where a vehicle technology may still on the leading edge, we have seen how a credit system can enable a positive return on investment more quickly, paving the way for systematic deployment of alternatives such as electric powered vehicles.

A carbon fuel standard in New York similar to California's, coupled with robust and sensible electric vehicle and infrastructure incentive programs, including the revision of untenable scrappage requirements, would help speed up DHL's fleet transition over the coming years and support the growing importance of clean transportation jobs in the state and country. The requirement to scrap a 2009 or older vehicle benefits only the worst offenders, and it limits the incentive for other fleet owners to continually modernize and reduce GHG emissions. With the growth in e-commerce, we see an increase in vehicle miles traveled by trucks, which today rely overwhelmingly on petroleum-based fuels. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments. Further, by encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York.

I encourage you to support for a Clean Fuel Standard similar to [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new and promising industries.

Sincerely,

Roger Libby
Head of Corporate Public Policy
DP DHL - Americas



**Good for the Economy.
Good for the Environment.**

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

As members and supporters of E2 (Environmental Entrepreneurs) we are writing to urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker). E2 is a national, nonpartisan group of business leaders, investors, and professionals from every sector of the economy. Our members have founded or funded more than 2,500 companies, created more than 600,000 jobs, and manage more than \$100 billion in venture and private equity capital.

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York would stimulate economic growth and incentivize a new market of domestically produced, price-competitive decarbonized fuels. Revenues generated through an LCFS would advance technologies and innovative business models that foster growth in new local industries and could support employee benefits like workplace charging and EV incentives, while also providing a healthier work experience for medium and heavy-duty vehicle operators, on and off the road.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

We encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Environmental Entrepreneurs • www.e2.org • facebook.com/e2.org • [@e2org](https://twitter.com/e2org)

Mid-Atlantic • Midwest • New England • New York • Northern California • Pacific Northwest • Rocky Mountains • San Diego • Southern California

Sincerely,

The following E2 members and supporters have electronically signed in support of a NY Clean Fuel Standard:

Clifford Adams

Managing Director, Coady Diemar Partners

Judith Albert

Chair, Board of Directors, Cornerstone Capital Group

Valerie Amor

Founder, Action Oriented Visionary, Drawing Conclusions LLC

Danny Argov

Global Account Technology Strategist, Microsoft

Erik Ashby

Dora Barlaz Hanft

Frances Beinecke

Former President, NRDC

Loren Blackford

Investor

Chris Carrick

Energy Program Manager, Central New York Regional Planning and Development Board

Suzanne Charle

Journalist, Freelance

Scott Englander

President, Longwood Energy Group LLC

Madison Freeman

Thomas Gately

President, Green Power Solutions

Bonnie Gurry

Independent Consultant

Patricia Hafford

Suzanne Hunt

President, Hunt Green LLC

Marcus Komm

Managing Director, UBS

Megha Lakhchaura

Director, Policy and Utility Programs (North America), EV-Box

Greg Mangan

Real Estate Advocate, Southwest Detroit Business Association

Mark Mondik

Raghav Murali

Senior Director of Policy and General Counsel, Center for Sustainable Energy (CSE)

Tasfia Nayem

Bill Ryall

Partner, Ryall Sheridan Architects

Su Sanni

Founder/CEO, Dollaride

Joe Silver

Program Manager, Urban Future Lab

Michael Sobczak

Heather Tausig

Associate VP of Conservation, New England Aquarium

Thomas Van Heeke

Policy Lead, Electrification, GM



September 9, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
New York State Capitol Building
Albany, NY 12224

Dear Governor Cuomo,

Electrify America, LLC, is a wholly-owned subsidiary of Volkswagen Group of America, and operates the nation's largest open network of DC fast chargers for electric vehicles. Our company is responsible for investing \$2 billion nationwide over ten years in zero-emission vehicle infrastructure, education and access efforts. To date, we have 38 ultra-fast chargers across ten locations in New York State, with another 11 chargers across three locations under construction. Through our Cycle 2 National ZEV Investment Plan, we have highlighted significant additional plans for expansion in the State of New York.

As a company investing heavily in clean transportation in New York, we respectfully urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker). A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. Such programs are already in place in California and Oregon, and have shown great success in reducing greenhouse gas emissions from transportation fuel and driving additional investment in clean transportation options.

Electrify America is planning for two additional investment cycles, which will invest a total of \$1 billion nationwide over the period from January 2022 to December 2026. Complementary state policies that support the clean transportation sector are a key component of how we evaluate investment decisions, and a Clean Fuel Standard for New York would encourage investment in more EV charging infrastructure in the state.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high-polluting transportation fuel providers to reduce the net emissions from use of their fuels, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

I encourage you to show your support for the Clean Fuel Standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

/s/

Matthew Nelson
Director of Government Affairs

July 28, 2020

Dear Governor Cuomo,

I am writing on behalf of the Element Markets group of companies. We do business in New York and currently work alongside the Department of Sanitation of the City of New York (DSNY) and National Grid to bring low carbon fuels to market. Today, those low carbon fuels are often delivered into California and other states with LCFS programs. We look forward to the day when low carbon fuels generated in New York are used to reduce GHG emissions and improve air quality for New Yorkers, instead of being transported across the country. We urge you to support a Low Carbon Fuel Standard in New York, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. This can either be accomplished directly through use of low carbon fuels or indirectly through the purchase of credits generated from the production and use of low carbon fuels by third parties.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers. Low carbon transportation fuels reduce the criteria pollutants in our air, which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring transportation fuel providers to transition to low carbon fuels or purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

At the Newtown Creek Wastewater Treatment Plant in Brooklyn and the Fresh Kills Landfill in Staten Island, methane gas that would otherwise be emitted into the atmosphere from wastewater treatment and decomposition of organic waste is captured and processed into pipeline quality biomethane. Element Markets sells this biomethane into the transportation fuels market, and more revenue can be realized from biomethane in states with LCFS programs. This means that New York's biomethane is often used to produce renewable compressed natural gas (CNG) and liquified natural gas (LNG) that powers buses and other transportation vehicles (and reduces transportation vehicle emissions) in California. In that case, New York benefits from the avoided emissions associated with capturing the methane and receives the revenue from sale of the low carbon fuel, but the transportation emissions benefit goes to California. If an LCFS existed in New York, ALL of the benefits of these projects could stay in New York and support development of additional projects (and jobs) that not only keep pollutants out of the air but also reduce transportation emissions.

I encourage you to show your support for the low carbon fuel standard by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven strategy to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,



Keri Bevel

Senior Vice President and General Counsel



September 9, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Re: Letter of Support for Clean Fuel Standard, A.5262-A (Woerner)/S.4003-A (Parker).

Dear Governor Cuomo,

My name is Joy Gardner and I'm writing on behalf of Empire Clean Cities. As a registered 501(c)(3) environmental nonprofit organization in New York and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

As you know, the Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions (GHG) associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers. Our organization works with hundreds of stakeholders in New York City and the Hudson Valley to cut harmful GHG, save on the cost of fuel, and reduce dependence on petroleum. A Clean Fuel Standard would help make the transition to cleaner fuels and advance technology an affordable option for fleets of all sizes and help to ensure New York is positioned at the forefront of green jobs market.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases, that are linked to severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50% of New Yorkers live in areas with failing air quality and the greater NYC metro region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce GHG and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to support the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Joy Gardner
Executive Director
Empire Clean Cities



Empire State Forest Products Association

The people behind New York's healthy forests and quality wood products

www.esfpa.org

47 Van Alstyne Drive / Rensselaer, New York 12144 / p: 518-463-1297 / f: 518-426-9502

September 17, 2020

Chairman
Michael J. McLarty
Finch Paper, LLC

Vice Chair
Jennifer DeFrancesco
B & B Forest Products, LTD

Treasurer
Christopher Truso
Farm Credit East

Secretary
Sarah R. Bogdanovitch
Natural Resources Consultant

Immediate Past Chair
Sean Ross
Lyme Timber Company

Executive Director
John K. Bartow, Jr.

Sarah Boggess
ReEnergy Holdings LLC

Pat Buff
B&B Lumber Co.

Timothy Burpoe, CF®
Molpus Woodlands Group, LLC.

René H. Germain, Ph.D.
SUNY ESF

Thomas E. Gerow, CF
Wagner Lumber Company

Dennis Gingles
International Paper Co.

Doug Handy
A&H Forest Management, Inc.

Michael W. Hanlon
Cotton-Hanlon, Inc.

Damon Hartman
Prentiss & Carlisle

Craig Jochum
Craig Jochum Logging

Susan Keister
Susan Keister, LLC

Elizabeth Lesnikoski
Burlington Electric

Paul Mitchell
Paul J. Mitchell Logging, Inc.

Charles Niebling
New England Wood Pellet, LLC

Jack Santamour
LandVest, Inc.

Edward G. Wright
W.J. Cox Associates, Inc.

John Zemanick
Gutchess Lumber Company

Counsel
Dennis J. Phillips, Esq.
McPhillips, Fitzgerald & Cullum

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo

The Empire State Forest Products Association (ESFPA) is New York's largest voice for forests and wood product manufacturing in New York State. With nearly 400 members representing forest landowners, loggers, wood product manufacturers and professional foresters, ESFPA represents the \$21 billion dollar sector and over 100,000 direct and indirect jobs throughout New York State. ESFPA is also a member of the Clean Fuels NY coalition and today we write to you to urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers. Using the residual woody materials from timber harvesting and wood product manufacturing also adds value to the clean fuel feedstock and diversifies the value chain of well-established, sustainable forest practices.

Adopting a Clean Fuel Standard that recognizes the contribution that our forests and agriculture can offer in decarbonizing New York's fuel supply will also diversify our supply and value chains and create new job opportunities in the production of low carbon fuels necessary for heavy transportation, maritime and airline fuels. It also creates markets for forest and agricultural products that helps sustain our working forests and fields and the natural solutions to climate change that benefits all New Yorkers while providing clean water, wildlife restoration and healthier forests.

A Clean Fuel Standard is a critical tool in reducing pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

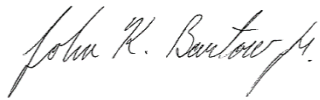
Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting

transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm , forest and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

We encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in cursive script that reads "John K. Bartow, Jr.".

John K. Bartow, Jr.
Executive Director



ENERGY VISION 138 East 13th Street New York, NY 10003
Tel: 212-228-0225 Web: energy-vision.org Twitter: @Energy_Vision

Dear Governor Cuomo,

On behalf of Energy Vision (EV), a New York-based 501(c)(3) environmental research and education organization and a founding member of the Clean Fuels NY coalition, I urge you to support adoption of a Low Carbon Fuel Standard for transportation in New York, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

Since its founding in 2007, EV's mission and work have been to advance commercial and cost-effective solutions for a carbon-neutral economy through research, education and advisory services. In tracking effective technology and policy options to decarbonize the transportation sector, we have been especially impressed by the measurable positive impacts achieved through state-level low-carbon and clean fuel standards.

A Clean Fuel Standard (CFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas (GHG) emissions associated with the fuels they make and sell. As we face unprecedented health and budget crises, a CFS would allow New York to clean up the transportation sector and so improve its air quality at minimal cost to the state or taxpayers.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants such as nitrogen oxides and particulate matter in our air, which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality, and the New York City metropolitan region is consistently ranked among the American cities with the worst air quality.

Transportation is New York's largest source of GHG emissions, at approximately 35% and growing. Cars and trucks rely overwhelmingly on petroleum-based fuels, and represent a significant portion of New York's harmful air pollution. By requiring providers of high polluting transportation fuels to purchase fuel or credits from low carbon fuel suppliers, the state can reduce GHG emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing payments for imported fuel.

By encouraging investment in the clean fuels market (including vehicle electrification), a CFS has the potential to spur economic growth across New York. There is immense economic potential in the production and use of low carbon fuels in NY, from jobs expanding the electric vehicle network to those building infrastructure to convert sewage, farm and food waste to clean, renewable fuels. To date, 38,000 jobs have been created in California as a result of that state's LCFS.

Energy Vision encourages you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution that aligns with the Climate Leadership and Community Protection Act and the ambitious targets to reduce transportation emissions in New York, improving air quality and driving investment in local projects and new green industries.

Sincerely,

Matthew P. Tomich
President



Dear Governor Cuomo,

My name is Jordan Ramer and I'm writing on behalf of EV Connect. As a business owner hoping to grow our New York operations and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will create local jobs in NYC, White Plains and Upstate New York at EV Connect to support deployment and customer support; raise hundreds of thousands in spending in the local economy and decrease carbon emissions over the next 12 months.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink, appearing to read "Jordan Ramer". The signature is fluid and cursive.

Jordan Ramer
CEO
EV Connect



October 1, 2020

The Honorable Andrew M. Cuomo
Governor of the State of New York
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

I am writing on behalf of EVgo, the nation's largest public fast charging company actively working to expand our presence in New York. As a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

EVgo is America's largest public electric vehicle (EV) fast charging network, with more than 800 direct current fast charger (DCFC) locations nationwide. Today more than 115 million Americans live within a 15-minute drive of one of our chargers. In New York, EVgo currently owns and operates more than 40 DC fast chargers across 20+ locations throughout the state, with additional sites under development.

EVgo chargers are located along high-traffic corridors, as well as in urban and suburban metro areas around dining, shopping, and entertainment locations, so that EV charging is integrated into everyday activities, boosting local economic development. Public fast charging also plays an important role for residents of multi-unit dwellings who lack access to home charging.

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers. The recent COVID-19 crisis has heightened the urgency of transitioning to a fully electrified transportation sector as one of the key elements to unlocking a more sustainable future for all, and a Clean Fuel Standard would help to enable that electrified future.

The transportation sector is the largest source of greenhouse gas emissions in New York, comprising of roughly 35% of all GHG emissions. The State of New York has already begun taking action to combat this by setting statewide targets of 850,000 EVs by 2025 and two million EVs by 2030.

A Clean Fuel Standard serves as a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report¹, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

¹ <https://www.stateoftheair.org/>

EVgo's public fast charging network aids the growth of New York's EV market by mitigating barriers to EV adoption, but this alone is not enough. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions by incentivizing clean transportation, all while progressing toward New York's EV goals. Adopting such a standard will also make purchasing a zero or near-zero emission vehicle more appealing and cost-effective for large public and private vehicle fleets

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. In California, 38,000 jobs have been created to date as a result of the state's Low-Carbon Fuel Standard, which has been one of the most important policy tools for market transformation in the California electric vehicle market.

I encourage you to show your support for the Clean Fuel Standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Carine Dumit

Carine Dumit
Director, Market Development & Public Policy
Carine.dumit@evgo.com

FORTISTAR LLC

One North Lexington Avenue, White Plains, New York 10601
Tel. (914) 421-4900 Fax. (914) 421-0052

October 6, 2020

Hon. Andrew Cuomo
Governor
State of New York
Executive Chamber
Albany, NY 12224

Dear Governor Cuomo:

FORTISTAR LLC, a White Plains, New York-based and privately-owned investment firm owns a portfolio of companies focused on implementing solutions now to address decarbonization challenges in power, transportation and industrial processes. One of our companies is focused on decarbonizing transportation primarily in the heavy truck segment. Key to this decarbonization effort is the implementation of a low carbon fuel standard (LCFS) which supports Renewable Natural Gas (RNG) displacing diesel. For this reason, I urge you to support the LCFS mandate proposed by New York State Assembly member Carrie Woerner (A5262A) and State Senator Kevin S. Parker (S4003A).

We take tremendous pride in our Clean Fuels NY Coalition membership and our company's work to address sustainability challenges that others view as too complex or uncertain. As a result of our push we've invested in groundbreaking sustainable solutions that capture harmful emissions from landfills and dairies to create an alternative fuel to displace diesel now while we wait for future electric and hydrogen solutions to be more economic and available.

As New York faces an unprecedented environmental, health and budget crisis, we urge you to recognize how a LCFS program will reduce greenhouse gas emissions, improve air quality and increase economic growth. Today, transportation is responsible for 35 percent of New York's greenhouse gas emissions (GHG), 50 percent of New Yorkers live in areas with failing air quality and credits purchased from low carbon fuel suppliers can improve air quality, reduce GHGs and create in-state jobs. All of this can be done without creating any new costs to the State of New York or its taxpayers.

By way of example, California adopted an LCFS program in 2011. Since 2011 it is estimated there have been over 300 renewable fuel stations built in California, with 12,000 additional heavy-duty vehicles put into service. Because of the LCFS program, much of this new infrastructure has been powered by RNG, which converts runaway methane (and its high greenhouse effect) into vehicle fuel. Combined, the California LCFS program has created 38,000 jobs, taxable revenue of over \$500 million and replaced nearly 900 million gallons of high-polluting diesel fuel with clean-burning RNG. FORTISTAR proudly owns TruStar Energy, which developed and operates 33 fueling stations producing over 30 million gasoline gallon equivalents (GGE) of RNG annually in California.

Furthermore, the change from diesel to RNG is estimated to reduce transportation carbon dioxide emissions by over 12 million tons, or the equivalent of taking 2.6 million passenger cars off the road. According to the California Air Resources Board (CARB), the lead agency for climate change programs in California, the use of RNG as a motor fuel decreases GHG emissions by up to 33 percent compared to other motor fuels. In fact, CARB estimates that RNG has the lowest GHG emissions profile, far lower than electric as a transportation fuel.

RNG is not only a proven solution with the greatest potential for GHG reductions, but is the only alternative fuel that is commercially available for the most polluting vehicles in New York State: class 8 trucks. We also estimate that RNG could displace 100 million GGE of diesel and also create \$200 million of construction in New York State and much needed local tax revenue.

There is no question that the State of New York is facing a series of unprecedented crises. Poor air quality is already a major problem and our health infrastructure is already at a breaking point due to the COVID-19 pandemic. Flight of capital and jobs is tearing through the state, upending lives and evaporating tax revenue. It is imperative that New York State must now take any and all actions it can to secure a cleaner, healthier and more prosperous future. A LCFS program is one of the few initiatives today that can unequivocally achieve all three. For the good of the state and the people of New York, we at FORTISTAR encourage you to show your support for the low carbon fuel standard, by publicly supporting A.5262-A (Woerner)/S.4003-A (Parker).

Sincerely,



Mark Comora
President

GENERAL MOTORS

Christopher F. Grimaldi, Esq.
Regional Director GM Public Policy
402 Fuera Bush Road #797
Glenmont, New York 12077
(518) 533-9856/(518) 410-2024 (cell)
christopher.grimaldi@gm.com

August 6, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, New York 12224

Dear Governor Cuomo,

General Motors is committed to joining with you to address climate change and to advance New York's clean transportation industry. As such, we ask that you consider including a Low Carbon Fuel Standard such as proposed in A.5262A (Woerner)/S.4003A (Parker) in your 2021-22 State Budget.

GM takes the challenge of climate change seriously and recognizes the role of the transportation sector in contributing to greenhouse gas emissions (GHG). This is a driving force behind our vision of a future with zero crashes, zero emissions, and zero congestion. Addressing climate change in an effective and sustainable manner requires a clear, stable, economy-wide approach. The best policies are broadly applied and aim to incentivize economic actors to respond in ways that achieve emissions reductions at the lowest societal cost. GM agrees with the consensus opinion of most economists that predictable policies that leverage market mechanisms and place a monetary value on carbon dioxide emissions are the most cost-effective options. Ultimately, to achieve the greatest reductions and maximize efficiency we believe such policies should be applied on a national basis.

However, as we work toward the longer-term goal of a nationwide market-based policy to reduce emissions, GM often takes the opportunity to express support for state-based initiatives like the low carbon fuel standard proposed in New York. Like cap-and-trade programs, low carbon fuel standards use the power of markets—introduced through credit/deficit trading mechanisms—and strong economic incentives to reduce GHG emissions from the transportation sector.

Such policies also have other key advantages:

- **Low carbon fuel standards are effective.** In several states and provinces, low carbon fuel standards have a proven track record of success in reducing GHG emissions. As New York begins work to meet the emissions reductions targets set by the Climate Leadership and Community Protection Act, a low carbon fuel standard could play a key role in meeting the state's goals.

GENERAL MOTORS

- **Low carbon fuel standards can create new revenues to support vehicle electrification.** Low-carbon-intensity fuel providers generate credits they can sell to other regulated parties to support their compliance. With the appropriate program design in place, the proceeds of these credit sales when generated by EV charging can be invested to support complementary policies, such as electric vehicle (EV) purchase rebates, that catalyze the EV market's growth. California's LCFS already models this approach.
- **Low carbon fuel standards spur economic growth.** Clean fuels standards encourage investment across the full breadth of the clean fuels market, from electrified transportation to biofuels to the emerging and promising field of net-zero-carbon synthetic fuels. This investment can create jobs expanding EV charging infrastructure, producing new fuels from bio feedstocks, or manufacturing EVs.

GM's experience as an EV industry leader has only served to underscore the importance of these benefits. We were the first automaker to invest in and launch a mass-market, long-range EV for everyone—the Chevrolet Bolt—as the first step on our path to an all-electric future. More EV models will debut in the coming years including entries into the truck segment. But automaker investments and EV model availability are just two of several important factors that must play a role in transforming and ultimately decarbonizing the transportation sector. Currently the market for EVs remains relatively small, with high battery costs driving up retail vehicle prices and inconsistent charging availability undermining consumer confidence in the utility of EVs.

Therefore, there is an urgent and near-term need for public policies that support the growth of a profitable EV market as we look ahead to reducing costs. The proposed low carbon fuel standard in New York could generate new revenues for the state to do just that and support the growth of advanced technology vehicle segments for companies like ours.

In conclusion, a low carbon fuel standard like the one proposed in A.5262A/S.4003A can be an effective policy solution for reducing transportation emissions in the state while driving economic growth and accelerating electrification. As the debate continues to evolve, GM encourages you to consider supporting such a policy.

Thank you for your consideration and for your strong support of General Motors throughout your entire tenure as governor.

Sincerely,



Christopher F. Grimaldi

Dear Governor Cuomo

September 18, 2020

My name is Peter Glauber, and I'm writing on behalf of Glauber Equipment Inc. As a business owner hoping to grow our New York operations and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will have the potential of adding 5-8 new jobs for our companies. These will be skilled labor and engineering & Design. **Glauber Equipment** engineers, designs and builds almost everything we sell to the market here in Buffalo. Currently, virtually 100% of our equipment is installed in other parts of the country, and a few in Canada. We hope New York can provide the incentives that will allow developers to help harness the harmful methane effects on the environment and provide additional job creation in OUR STATE. We have all the expertise here, benefiting NY workers who pay taxes.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Peter Glauber
President

GREEN ENERGY TECHNOLOGY

Dear Governor Cuomo,

My name is John M Comack and I'm writing on behalf of Green Energy Technology. As a business owner in New York (or: as a business owner hoping to grow our New York operation) and a member of the Clean Fuel NY coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner) /S.4003- (Parker)

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will help the environment, increase job creations and will help Green Energy Technology grow in the electric charging industry for last mile trucking.

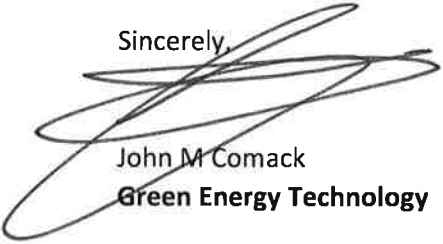
An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular disease that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions- approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

I encourage you to show your support for the low carbon fuel standard, by supporting [A.526-A (Woerner) /S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air and drive investment into new industries.

Sincerely,



John M Comack

Green Energy Technology



Jennifer Keesson
Country Sustainability Manager
IKEA Retail US, Ingka Group

September 9, 2020

Dear Governor Cuomo,

My name is Jennifer Keesson and I'm writing on behalf of IKEA Retail US. As a business owner in New York and a supporter of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will allow IKEA Retail US (IKEA), to meet its sustainability goals through our activities in NY State. Our electric vehicle delivery and the zero-emission delivery zone we are working to create with partner companies eBay and Etsy build jobs unique and local to New York which cannot be relocated. IKEA is investing over \$750,000 in charging infrastructure and construction cost at our Staten Island facility. This legislation allows IKEA to replicate comparable efforts in California and Oregon giving NY a competitive advantage over other states on the East Coast. IKEA is expanding our electric charging infrastructure throughout our NY stores and distribution center and this initiative will support our progress as an industry leader. Additionally, this will allow IKEA to share our story as a win through public partnerships that prioritize green energy policy. A Clean Fuel Standard will help to promote additional investments in EV infrastructure as well as encourage logistics companies to add zero emission deliveries to their menu of services, and making it easier for retailers, like IKEA, to implement zero emission delivery programs.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to



the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Keesson". The signature is written in a cursive, flowing style.

Jennifer Keesson
Country Sustainability Manager
IKEA Retail US, Ingka Group



Dear Governor Cuomo,

My name is Bianca Heroiu and I'm writing on behalf of The Lion Electric Co, an all-electric OEM providing purpose built zero-emission heavy-duty vehicles in the great State of New York. As a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will ensure that in addition to operational and economic benefits, our zero-emission vehicles will eliminate criteria pollutant and greenhouse gas emissions in the New York communities, and create a safer, cleaner, and healthier environment for the drivers who operate the vehicles, and the communities they serve every day. It will show tremendous support to an all-electric, school bus and medium-heavy duty truck OEM like Lion, to continue to influence policies on electrification and fight against transportation technologies that cause criteria pollutant and greenhouse gas emissions.

Benefits for the end users have always been at the forefront of our manufacturing policy, but when it comes to ensuring communities' health, Lion has decided to take the lead regarding educating legislators, associations, and operators along with the public at large.

Touching on the high-density areas of New York state, it is important to also strategically place charging corridors with upfront cost reduction in the proximity of school districts with the highest numbers of students that use school buses daily. Encouraging school districts to electrify their fleet will greatly reduce the exposure of children and drivers to gas emissions as well help attain the State of New York's gas reduction plan.

A pilot program in California, the Cajon Valley deployment, that incorporated vehicle-to-grid technology has shown that, with proper planning, a school bus can generate up to \$6,000 a year in revenue for a school. The buses can charge at night when electricity rates are low and then supply electricity to the school or grid during the day when rates and consumption are higher, and the buses are either carrying students or not in use. This type of use is even more beneficial during the summer, when a large portion of school bus fleets are left idle, allowing more of their battery capacity to be utilized to support the grid. This additional revenue stream generated for the school will translate to more personnel being hired, or additional programs being implemented for the students.

We believe that there is tremendous opportunity for job creation by heavily investing in infrastructure for all-electric zero-emissions vehicles: technicians, electricians, engineers, project managers, sales representatives, customer service, just to name a few.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

I encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Bianca Heroiu

Name: Bianca Heroiu
Title: Grant Manager
Company: The Lion Electric Co.
Date: 27th of July, 2020



October 5, 2020

Dear Governor Cuomo,

On behalf of Lyft, Inc. (Lyft), a business that operates in New York and a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard, such as that proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality, mitigate climate change, and clean up transportation at no cost to the state using an efficient market-based mechanism that has been proven to work (e.g. in California, which pioneered this type of standard).

Earlier this year Lyft [announced](#) a commitment to achieving 100% electric vehicles (EVs) on the Lyft platform by 2030, the first transportation network company (TNC) to do so. In New York over the next decade, we expect this commitment to result in:

- 1 million metric tons of GHG emission reductions
- Up to \$750 million in savings for drivers from reduced vehicle operating expenses
- 4.5 billion electric vehicle miles traveled (eVMT)

An LCFS in New York would help accelerate progress toward this goal – and for vehicle electrification more widely – because it would align the transportation ecosystem’s incentives toward low-carbon solutions such as electric vehicles. And it would make New York a more attractive state for Lyft to use its electrification resources.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association’s annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is also New York’s largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York’s harmful air pollution. By requiring high-polluting transportation fuel providers to purchase credits from low-carbon fuel suppliers, the state can reduce greenhouse gas emissions *and* improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, an LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.



I encourage you to show your support for the Low Carbon Fuel Standard by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution that will reduce transportation emissions in New York, improve air quality, help combat climate change, create jobs, and drive investment into new industries.

Sincerely,

A handwritten signature in black ink that reads "Sam Arons". The signature is fluid and cursive.

Sam Arons
Director of Sustainability
Lyft, Inc.



National Biodiesel Board
1331 Pennsylvania Ave., NW
Suite 505
Washington, DC 20004
(202) 737-8801 *phone*

National Biodiesel Board
605 Clark Avenue
PO Box 104898
Jefferson City, MO 65110
(800) 841-5849 *phone*

October 2, 2020

Honorable Andrew M. Cuomo
Governor, State of New York
State Capitol
Albany, New York 12224

Dear Governor Cuomo:

On behalf of the National Biodiesel Board, a trade association which represents the biodiesel and renewable diesel producers in the United States and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

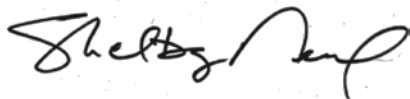
Adopting a Clean Fuel Standard in New York will send market signals to the biodiesel and renewable diesel producers that the state is open for the renewable liquid fuels business. Our experience with the California (CA) Low Carbon Fuel Standard (LCFS) was to see biodiesel use go from 14 million gallons in 2011 to over 850 million gallons in 2020. These fuels have been responsible for over 45% of the low carbon credits generated in the CA LCFS program. Since 2009, CA has also seen the development of nine biodiesel facilities and one renewable diesel production plant, supporting 4,400 full-time jobs and \$156 million in wages. Overall, the CA LCFS has created 38,000 jobs.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

I encourage you to show your support for the Clean Fuel Standard by supporting [A.5262-A (Woerner)/S.4003-A (Parker)] and by including this policy initiative in your 2021-22 Executive Budget Proposal. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink, appearing to read "Shelby Neal". The signature is fluid and cursive, with the first name "Shelby" being more prominent than the last name "Neal".

Shelby Neal
Director of State Government Affairs



NaturalUpcycling

CREATING A SUSTAINABLE FUTURE FOR OUR COMMUNITY

Dear Governor Cuomo,

My name is Christopher Noble and I'm writing on behalf of Natural Upcycling, a leading food waste collection company. As a business owner in New York and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will encourage the growth of food waste disposal infrastructure, specifically anaerobic digesters, that will assist our business in meeting the goals of recently passed food waste legislation. Our business will continue to add jobs in the coming years to provide the logistical conduit from food businesses and anaerobic digesters.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Christopher Noble
Manager
Natural Upcycling

3 November 2020

Honorable Andrew M. Cuomo
Governor of New York State
New York State Capitol
Albany, NY 12224

Dear Governor Cuomo:

We at Neste congratulate you for your excellent work leading New York to adopt some of the country's most ambitious climate targets, including economy-wide, net-zero carbon emissions by 2050. Neste supports the laudable goals of accelerating the transition to a cleaner, more efficient transportation sector that will improve public health, create new economic opportunities, and reduce net new carbon emissions.

Neste is a global fuel producer specializing in premium quality, lower emission heavy transportation fuels. We are the world's largest producer of Renewable Diesel and Sustainable Aviation Fuel, both of which are refined from waste and residues, rather than fossil fuels. Neste is deeply committed to sustainability, and has committed to carbon neutrality in its fuel production by 2035. We are proud that our efforts have ranked us in the top 3 on the Global 100 list of the most sustainable companies for two years in a row.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. The State has begun to tackle transportation sector emissions by supporting electric vehicles and associated infrastructure. However, the reality is that solely relying on electric solutions like purchasing new electric buses and upgrading the electric charging infrastructure is a time consuming and capital intensive path forward and risks overlooking complementary strategies that can decarbonize the liquid fuels that continue to be used during the transition to zero-emission vehicles.

As a fuel supplier poised to dramatically grow our New York operations and a member of the Clean Fuels NY coalition, we urge you to support the adoption of a Low Carbon Fuel Standard in New York, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

Neste US, Inc.

3040 Post Oak Blvd, Suite 1700
Houston, Texas 77054 USA



The Low Carbon Fuel Standard is a vendor-neutral, technology-neutral, performance-based program that incentivizes fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state will reduce greenhouse gas emissions and improve air quality, while creating in-state jobs and supporting regional economic development.

Adoption of a Low Carbon Fuel Standard is complementary to other carbon emission reduction frameworks, including the Zero-Emission Vehicle programs already in place or under consideration in New York. For example, the multi-state ZEV Action Plan will be effective at encouraging sector-wide reductions in greenhouse gas emissions and the transition of transportation solutions away from fossil gasoline and fossil diesel. But, its success will be accelerated and amplified by the coordination with complementary programs. Adoption of a Low Carbon Fuel Standard will provide targeted policy to address the urgency of the need to decarbonize liquid fuels, which are critical to reducing carbon reduction and carbon neutrality goals.

Even if New York reaches its ambitious electrification goals for the medium- and heavy-duty sectors, most trucks and buses within the State will still operate on diesel fuel in 2050. Complementary programs will be necessary to reduce the carbon emissions of these vehicles, in order to meet the State's carbon goals. Programs to decarbonize diesel fuel will be critical and will complement longer-term commitments to electrification of these vehicles. This is especially true for those transportation sectors that will be difficult to electrify, such as nonroad engines, marine engines, aviation, and significant segments of the long-haul transportation market.

A Low Carbon Fuel Standard would allow New York to improve air quality from non-carbon emissions and clean up the transportation sector at no cost to the state or taxpayers. Converting a fossil diesel bus to run on renewable diesel will provide significant particulate emission reductions, which adds a significant human health co-benefit and helps to address equity and related environmental justice issues.

Adopting a Low Carbon Fuel Standard in New York will provide access to advanced, low-carbon fuel options to the State's public fleets, including those operated by the Department of Transportation, the MTA, and the Port

Authority, as well as private fleets with decarbonization targets in dire need of public policy to support them.

Neste is one of the largest suppliers of renewable diesel to California and is able to offer the advanced, low-carbon option to fuel purchasers at a price that is competitive with the high-carbon petroleum diesel alternative. Once a Low Carbon Fuel Standard is adopted in New York, the State's public and private fleets will have a similar ability to immediately reduce emissions without the need for capital expenditures for new vehicles and infrastructure.

By encouraging investment in the clean fuels market, the Low Carbon Fuel Standard also has the potential to spur economic growth across New York. In addition to increased activity from production and use of low-carbon fuels, New York has significant related industries that can provide raw materials to produce low-carbon fuels.

A New York Low Carbon Fuels Standard would create a dependable market for cleaner fuels, which will drive steady investment and innovation in the production and use of non-petroleum fuel sources and will be a valuable tool to substantially reduce pollution and emissions from the transportation sector. With the adoption of the Low Carbon Fuel Standard, New York will be well positioned to join other jurisdictions that already have adopted a similar policy, including California, Oregon and British Columbia.

We encourage you to show your support for the Low Carbon Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Neste US, Inc.

A handwritten signature in cursive script, reading "Dayne Delahoussaye". The signature is written in black ink and is positioned above the printed name and title.

Dayne Delahoussaye
Senior Advisor, Public Affairs



October 14, 2020

Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capital Building
Albany, NY 12224

Dear Governor Cuomo:

My name is Jason Swede and I'm writing on behalf of the New York Corn and Soybean Growers Association. As a member of the Clean Fuels NY coalition, we urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will support greater use of low-carbon renewable fuels such as ethanol and biodiesel, increasing demand for New York farmers who produce the renewable feedstocks for these fuels.

With a Clean Fuel Standard that is technology neutral and performance based, using readily available biofuels saves consumers money while reducing emissions. Both California and Oregon continue to rely on biofuels to meet their Low Carbon Fuel Standards. New York's timely approval last year of higher blends of ethanol supports greater replacement of higher carbon fossil fuels with low carbon renewables that cost less and are more affordable to families at all income levels. With the right design, a carbon performance standard will drive innovation and deliver emissions reductions throughout the value chain, including from New York farmers.

The U.S. Department of Energy's Argonne National Lab models lifecycle emissions of transportation fuels. Known as the GREET model, it demonstrates steady improvement in corn ethanol's lifecycle greenhouse gas (GHG) profile. The current model shows corn-based ethanol's carbon intensity is about 41 percent below the carbon intensity of baseline gasoline.

Updated lifecycle analysis from the U.S. Department of Agriculture finds that, going forward, additional low-carbon improvements in farming practices and ethanol production could result in ethanol that is 70 percent lower in GHG emissions than gasoline. The addition of technologies such as carbon capture and sequestration and accounting for soil carbon sequestration could push future ethanol production to carbon neutrality, increasing the benefits of blending more renewable ethanol.

Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country. According to EPA fuel trends data, as biofuels blending has increased, the volume of harmful hydrocarbon aromatics in gasoline has dropped, reducing negative health outcomes from exposure to fine particulate matter (PM_{2.5}) resulting from aromatic hydrocarbon emissions

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, including suppliers of low carbon renewable fuels, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, biomass, and farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,



Jason Swede
President
New York Corn and Soybean Growers Association



New York Farm Bureau • 159 Wolf Road P.O. Box 5330 • Albany, New York 12205 • (518) 436-8495 Fax: (518) 431-5656

November 2, 2020

The Honorable Andrew Cuomo
State Capitol Building
Albany, NY 12210

RE: Clean Fuels NY

Dear Governor Cuomo,

New York Farm Bureau (NYFB), the state's largest general farm advocacy organization, supports the development of a Clean Fuel Standard (CFS) in New York State. As a member of the Clean Fuels NY Coalition, NYFB urges you to support such a standard as proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm, and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date due to the creation of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

NYFB believes New York State's agriculture can be a part of the climate change solution. Not only as carbon sinks, but farmers are already utilizing technologies such as anaerobic digesters that produce renewable natural gas that could be used in place of traditional fossil fuel derived fuels. Further, many agricultural crop residuals produce biologic materials that can be converted and refined into biofuels that would support a CFS and could potentially generate local sources of fuels. There is so much untapped potential, but farmers need a system that rewards the adaptation of these capital intensive investments.

I encourage you to show your support for the Clean Fuel Standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink, appearing to read "EWolters", is positioned above the typed name.

Elizabeth Wolters
Deputy Director of Public Policy



Dear Governor Cuomo,

On behalf of the New York League of Conservation Voters (NYLCV), I respectfully urge you to include a Clean Fuel Standard (CFS), also known as a Low Carbon Fuel Standard, in your Fiscal Year 2022 budget proposal. A CFS is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the carbon intensity of their fuels by a set amount. California's CFS has successfully reduced transportation emissions at negligible cost to consumers and no cost to the State government other than administering the program.

Balancing New York State's next budget will be a difficult proposition, especially since our fiscal crisis is due to the federal government's failings and does not reflect your admirable stewardship of the state budget and economy over the past decade. As you know, transportation is the number one source of greenhouse gas (GHG) emissions in New York, and achieving the Climate Leadership and Community Protection Act's (CLCPA) goal of reducing GHG emissions by 85% by 2050 will require eliminating almost all transportation emissions. If we are to meet this target, we must begin reducing transportation emissions as soon as possible. However, it seems unlikely given the fiscal crisis that the State will be able to allocate much, if any, new funding for clean transportation in the FY 22 budget. A CFS can ensure that we remain on track even without new spending.

The New York CFS, modeled on current legislation sponsored by Assemblywoman Carrie Woerner and Senator Kevin Parker (A. 5262-A/S. 4003-A), would require manufacturers and importers of high-carbon intensity fuels to either reduce their carbon intensity (for instance, by blending liquid fossil fuels with biofuels) or purchase credits from low-carbon intensity fuel manufacturers and importers, such as operators of electric bus fleets like the MTA. The CFS provides a meaningful subsidy for public transit agencies and school bus, delivery van, and for-hire vehicle fleet operators to switch to electric vehicles.

We expect electrification to be the primary beneficiary of a CFS, especially as the cap on carbon intensity is ratcheted down over time. However, technology is not currently available for widespread transition of medium- and heavy-duty fleets such as sanitation trucks and tractor-trailers to electric engines. The elegance of a CFS as a performance-based standard is that it would still significantly reduce emissions from these vehicles by providing them with an incentive to switch to biodiesel and renewable natural gas, both of which are low-carbon fuels that can be readily dropped into existing engines. Moreover, the production of renewable natural gas requires anaerobic digestion, which turns organic waste such as food scraps and farm

waste into a useful fuel. By creating a market for this feedstock, a CFS would provide a new revenue stream for farmers and aid in the implementation of the Food Scraps and Food Waste Recycling Law that you proposed and signed in 2019.

A Clean Fuels Standard would reduce transportation emissions by at least 20% over the next decade at no cost to the State of New York. This would mean significant progress toward meeting our obligations under the CLCPA, helping mass transit agencies meet your goal that their bus fleets be fully electric by 2040, and improved air quality throughout New York State. This is a rare opportunity to launch an ambitious but achievable new program that will reduce emissions, improve air quality, and create new jobs at no cost to the State. I welcome the opportunity to discuss the CFS further with your staff at their convenience.

Thank you,

Julie Tighe
President
New York League of Conservation Voters



Natural Gas Vehicles for America

400 North Capitol Street, N.W.
Suite 450
Washington, D.C. 20001
ngvamerica.org

Daniel Gage
President
dgage@ngvamerica.org
202.824.7397 office
202.824.9166 fax



September 9, 2020

Hon. Andrew Cuomo, Governor
State of New York
Executive Chamber
New York State Capitol
Albany, New York 12224

Dear Governor Cuomo:

I write on behalf of the New York State-based members of Natural Gas Vehicles for America (NGVAmerica). As the national trade association for the natural gas vehicle (NGV) market, NGVAmerica has many members with operations in New York and others with plans to grow their operations in state. As a member of the Clean Fuels NY coalition, NGVAmerica urges you to support a Clean Fuel Standard, such as one proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to lower greenhouse gas emissions, improve air quality, and clean up the transportation sector at no cost to the State or taxpayers.

As experienced in California, adopting a Clean Fuel Standard in New York will result in increased jobs and investments in clean transportation by our members as well as achieve an immediate reduction in emissions today because natural gas vehicles are already available in all classes of vehicles and are cleaner running than conventional fuels.

The near zero natural gas engines (manufactured by Cummins in Jamestown, NY) are proven, cost-effective and available today for medium- and heavy-duty vehicles. These natural gas engines already meet the very demanding low-NOx standard recently adopted by California but not slated to go into effect until 2027. Using renewable natural gas (RNG) in these natural gas engines provides additional environmental benefit in the form of significant greenhouse gas emissions reductions. Fueling with RNG also creates new economic development for energy created from wastewater treatment, landfills, animal waste and other methane sources and significantly increases air quality by reducing the amount of methane released.

New York state has many fleets that understand the benefits of running on natural gas including fleets from UPS, PepsiCo/Frito-Lay, Waste Management, Wegmans, Tops, USPS contractors, Manhattan Beer Distributors, Baldor Concrete, National Grid, CENTRO transit buses and the recently announced NYC MTA 800 CNG buses that will run on RNG.

Advocating the increasing use of NGVs where they benefit most.
For the economy. For the environment. For health. For security. **For America.**

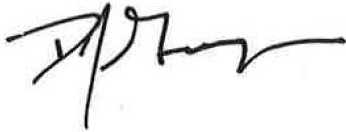
Adopting a Clean Fuel Standard will support New York's ongoing efforts to reduce air pollution which contributes to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of its Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to endorse a Clean Fuel Standard for New York by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions, improve air quality and drive investment into new industries in New York.

Sincerely,



Daniel J. Gage
President
NGVAmerica

May 21, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
State St. and, Washington Ave.
Albany, NY 12224

RE: Support for Low Carbon Fuel (LCFS) Standard in New York State

Dear Governor Cuomo:

On behalf of Nikola Corporation, I am writing to express our support for implementation of the Low Carbon Fuel Standard (LCFS) program in New York State. As a business looking to grow our zero emission transportation and infrastructure operations in New York and as a member of the Clean Fuels NY Coalition, we urge your support of the LCFS, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker). By pledging your support, New York State is recognizing LCFS's importance in accelerating transportation electrification adoption and keeping New York on the forefront of advancing zero emissions and low carbon technology, allowing New York to improve air quality and clean up the transportation sector. At no cost to the state or taxpayers, this technology-neutral, performance-based standard requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

Nikola Corporation is globally transforming the transportation industry. As a designer and manufacturer of battery-electric vehicles (BEV), fuel cell electric vehicles (FCEV) and hydrogen stations, Nikola is driven to revolutionize the economic and environmental impact of commerce as we know it today. Committed to a clean transportation future from energy creation to energy consumption, Nikola is developing a robust U.S. and European footprint leveraging key strategic industry partnerships such as IVECO, Bosch, Hanwha, Nel and others. The company's vision is to be the zero emissions commercial transportation system leader. Nikola is the only company offering both BEV and FCEV solutions; addressing both short-haul and long-haul markets for commercial fleets.

Nikola plans to launch its battery electric truck in North America in 2021. The initial trucks will be manufactured in Europe by our partner IVECO until our facility in Coolidge, Arizona is complete. In the case of hydrogen, Nikola's business model uniquely supplies both the truck and fueling infrastructure, solving the fleets' concerns of where to refuel. The company plans to deploy up to 700 fueling and charging stations across North America to support its freight customers. Among the 14,000 trucks pre-ordered, Nikola has secured a large launch fleet customer in Anheuser Busch who has submitted an order for 800 zero emission trucks. These zero emission fleet vehicles will be utilized to transport Anheuser Busch product between their facilities across the U.S.

According to the U.S. Environmental Protection Agency (EPA), the transportation sector is one of the largest contributors to anthropogenic U.S. greenhouse gas (GHG) emissions. According to the *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990–2017* (the national inventory that the U.S. prepares annually under the United Nations Framework Convention on Climate Change), transportation accounted for the largest portion (29%) of total U.S. GHG emissions in 2017. Cars, trucks, commercial aircraft, and railroads, among other sources, all contribute to transportation end-use sector emissions. Within the transportation sector, in 2017, medium and heavy-duty trucks was the second largest contributor of the greenhouse gas emissions (23%) behind light-duty vehicles.¹ Transportation is New York’s largest source of GHG emissions—approximately 35 percent and growing.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. We appreciate your consideration for implementing this policy, by supporting A.5262-A (Woerner)/S.4003-A (Parker). Through the implementation of the LCFS, New York can take a bold lead to reduce carbon emissions, improve air quality and drive investment in advanced transportation and energy sector industries.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alana Langdon', written in a cursive style.

Alana Langdon
Sr. Manager, External Affairs and Public Policy

¹ <https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>



Noblehurst Green Energy

Dear Governor Cuomo,

My name is Christopher Noble and I'm writing on behalf of Noblehurst Green Energy, an anaerobic digester company that recycles both manure from our adjacent dairy operation Noblehurst Farms and food waste from the local community. As a business owner in New York and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will encourage the expansion of food waste disposal infrastructure that will assist our business in meeting the goals of recently passed food waste legislation.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Christopher Noble
Manager
Noblehurst Green Energy



Northeast Dairy Producers Association, Inc.

PO Box 133 • Geneseo, NY 14454

info@nedpa.org • 585.237.8894

August 1, 2020

The Honorable Andrew M Cuomo, Governor
The State of New York
Executive Chamber, State Capitol
Albany, NY 12224

Dear Governor Cuomo,

On behalf of the Northeast Dairy Producers Association (NEDPA), as a 2,600 cow dairy farmer, and a member of the Clean Fuels NY Coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will create a significant incentive for dairy farmers to harvest biogas, generated from dairy cow waste, and turn it into renewable natural gas (RNG) for the transportation sector. In addition, RNG can be used to decarbonize natural gas, further reducing New York's carbon footprint. The LCFS market incentives can be a game changer for New York's dairy industry, thus creating an additional revenue source for an agricultural sector under significant economic stress.

Adopting an LCFS that includes the environmental value of biogas co-digesting food waste with manure and amending the CLCPA to accept biogas as renewable energy from both manure and food waste will allow NYS to meet three important goals. Manure processed through an anaerobic digester significantly reduces methane emissions and creates renewable energy. Recycling food waste to recover the energy and nutrients reduces GHG emissions and preserves landfill space. Monetizing the environmental value of renewable energy produced from farm based anaerobic digestion will keep the carbon credits here in NYS instead of exported to California.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm, and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

NEDPA encourages you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink that reads "John Dickinson". The signature is written in a cursive style with a large, prominent initial "J".

John Dickinson, Chair
Northeast Dairy Producers Association



September 24, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Re: Support for Clean Fuel Standard

Dear Governor Cuomo:

On behalf of 196,100 supporters residing in New York, the Natural Resources Defense Council (NRDC) urges you to support the creation of a New York Clean Fuels Standard as proposed by by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality, combat climate change, clean up the transportation sector and boost jobs at no cost to the state or taxpayers.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

The Clean Fuel Standard is a critical part of a suite of clean energy policies that are necessary to ensure the transportation sector does its fair share to meet

NATURAL RESOURCES DEFENSE COUNCIL

40 W 20TH STREET | NEW YORK, NY | 10011 | T 212.727.2700 | F 212.727.1773 | NRDC.ORG

economy-wide GHG emission reduction targets required under the landmark Climate Leadership and Community Protection Act. The Clean Fuel Standard is complementary to and supportive of strong light-duty and heavy-duty vehicle emissions standards, zero emission vehicle requirements and incentive programs, the Transportation & Climate Initiative and plug-in and hydrogen electric vehicle fueling infrastructure.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Richard Schrader
New York Political Director
Natural Resources Defense Council

Dear Governor Cuomo,

My name is Leonard Lincoln and I'm writing on behalf of Odyne Systems LLC. As a Director of Sales of a business selling in New York (hoping to grow our New York operations) and as a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting a Clean Fuel Standard in New York will help Odyne Systems sell hybrid systems into the utility (work truck) fleet market. Our end customer is the fleet manager or fleet vehicle purchasing professional who will specify the use of an Odyne System during the vehicle(s) purchase process. The build of full vehicle requires the specification of many items including chassis and other equipment. In the end, each vehicle is custom or semi-custom built for the end customer and Odyne becomes one of a multi-step, distributed process to assemble the end vehicle. The utility truck market consists of municipal and investor owned utilities serving overlapping regional areas. There are hundreds of such utilities across the United States and fleet size can range from 5 to thousands. Utility work trucks are a subset of the total work truck market which can be defined as a vehicle which spends a notable amount of energy performing tasks other than pure mobility. Odyne's primary applications include bucket lift trucks, digger derricks, mobile cranes, and mobile underground utility support. The Odyne Plug-in Hybrid System is an independent engineered and patented system which can be added to Class 6-8 work trucks to allow them to perform most or all primary work functions electrically. Conventional work trucks utilize the primary combustion engine or on-board diesel generators to support the work function. The Odyne system is a plug-in hybrid system which utilizes rechargeable Lithium Ion battery packs to provide power for the job functions which include hydraulic loading, 120/240V power, 12V battery support, and auxiliary heat and air conditioning. The system also has the capability to improve fuel economy and reduce emissions in the driving function by providing launch assist and regenerative braking through the transmission power take-off unit. Odyne Systems is a green energy technology company.

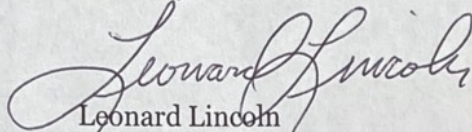
A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,



Leonard Lincoln
Director of Sales
Odyne Systems, LLC



1131 Town Line Road
Auburn, NY 13021
315-253-9220 (p)(f)
www.wwpfi.com

September 24, 2020

The Honorable Andrew M Cuomo, Governor
The State of New York
Executive Chamber, State Capitol
Albany, NY 12224

Dear Governor Cuomo,

As a 6th generation Dairy farmer in NY with a history producing renewable power from Anaerobic Digestion with Co-Digestion, I would love to see the NYC busses powered by upstate RNG from Dairy farms, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will create a significant incentive for dairy farmers to harvest biogas, generated from dairy cow waste, and turn it into renewable natural gas (RNG) for the transportation sector. In addition, RNG can be used to decarbonize natural gas, further reducing New York's carbon footprint. The LCFS market incentives can be a game changer for New York's dairy industry, thus creating an additional revenue source for an agricultural sector under significant economic stress.

Adopting an LCFS that includes the environmental value of biogas co-digesting food waste with manure and amending the CLCPA to accept biogas as renewable energy from both manure and food waste will allow NYS to meet three important goals. Manure processed through an anaerobic digester significantly reduces methane emissions and creates renewable energy. Recycling food waste to recover the energy and nutrients reduces GHG emissions and preserves landfill space. Monetizing the environmental value of renewable energy produced from farm based anaerobic digestion will keep the carbon credits here in NYS instead of exported to California.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm, and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

I encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

Jonathan T Patterson

Patterson Farms Inc.

Corporate Headquarters

968 Albany Shaker Road
Latham, NY 12110
518.782.7700



November 3, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Re: Clean Fuel Standard Support Letter

Dear Governor Cuomo:

On behalf of Plug Power Inc., (“Plug Power”) a clean technology company headquartered in upstate New York for over twenty years, recognized as a world leader in the commercialization of fuel cell and green hydrogen products, and as a member of the Clean Fuels NY coalition, Plug Power urges you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As the State of New York faces an unprecedented health and budget crisis, adoption of a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at virtually no cost to the State or taxpayers.

Adopting a Clean Fuel Standard in New York will directly impact the explosive growth of companies such as Plug Power. Currently, Plug Power employs over 1,000 associates, half of whom are resident at our upstate facilities in Latham, Rochester and Clifton Park, New York. Plug Power has recently invested over \$100 million to acquire and bring to New York clean hydrogen generation technologies and products. We are in active discussions with New York entities to locate green hydrogen generation plants in western New York that represent additional investment of well over \$100 million and will generate over 100 jobs in the next 18 to 24 months.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association’s annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York’s largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York’s harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse

Corporate Headquarters


968 Albany Shaker Road
Latham, NY 12110
518.782.7700



gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.



Gerard L. Conway, Jr.
General Counsel

July 31, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

RE: Supporting New York's Low Carbon Fuel Standard

Dear Governor Cuomo,

My name is Shailesh Sahay and I'm writing on behalf of POET LLC. As a business supplying millions of gallons of low-carbon biofuels to New York, and a member of the Clean Fuels NY coalition, we support a Low Carbon Fuel Standard, such as proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, an LCFS that recognizes the value of all low carbon fuels would allow New York to improve air quality and clean up the transportation sector.

As one of the world's largest producers of plant-based biofuels, POET is deeply committed to decarbonizing transportation and developing cleaner, cost-effective alternatives to fossil fuels. Adopting an LCFS complemented by other pro-biofuel policies in New York will drive significant new investment in clean fuel infrastructure, increase value to New York's agriculture sector, and make greener renewable fuel blends more accessible and affordable for New York consumers. For example, a LCFS could help speed the state's transition from E10 to cleaner E15 fuel. The retail price of E15 is generally \$0.05 to \$0.10 less per gallon at the pump compared to E10, but the potential carbon savings is even more impactful. Research shows that shifting from E10 to E15 in New York's existing light duty vehicle fleet would eliminate 748,000 metric tons of carbon emissions per year, which is the equivalent of removing approximately 129,400 vehicles from the road.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

We encourage you to show your support for the low carbon fuel standard, by supporting A.5262-A (Woerner)/S.4003-A (Parker). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shailesh Sahay". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Shailesh Sahay
Senior Regulatory Counsel
POET LLC



August 24, 2020

VIA ELECTRONIC MAIL TO: The Honorable Andrew Cuomo, Governor of New York

Re: A5262-A (Woerner)/S4003-A (Parker) – Low Carbon Fuel Standard

Dear Governor Cuomo:

On behalf of Rivian Automotive, LLC, ("Rivian"), I am submitting this letter of support for A5262-A/ S4003-A, bills establishing a Low Carbon Fuel Standard (LCFS) critical to reducing greenhouse gases and criteria pollutants. As a manufacturer of all electric trucks and SUVs, Rivian also supports the Memorandum of Understanding (MOU) that you entered into with 14 other states and the District of Columbia to foster a self-sustaining market for zero emission medium- and heavy-duty vehicles and New York bill S8765 (a bill directing the Commissioner of the Department of Environmental Conservation to promulgate rules and regulations establishing targets for the sales of zero emissions heavy duty vehicles in the state).

Founded in 2009, Rivian is an independent U.S. company dedicated to the production and distribution of Rivian's Electric Adventure Vehicles™ – namely pick-up trucks and SUVs – that encourage consumers to enjoy the outdoors and seek adventure utilizing zero emission, environmentally friendly vehicles. In addition, we also have a commitment with our investment partner, Amazon, to develop and produce 100,000 all electric heavy-duty class 2b and 3 trucks by 2030 for last mile delivery (referred to as the RPV). With a substantial presence of over 2,500 employees in Michigan and California, and a manufacturing facility in Normal, IL, the R1T pickup truck, R1S SUV, and RPV delivery van are scheduled to go into production in 2021.

Rivian's lineup of vehicles supports our Keep The World Adventurous Forever™ mission, by providing an environmentally sustainable alternatives to the incumbent technology of emission generating, internal combustion engine equipped vehicles. Indeed, Rivian believes that environmental sustainability can only be reached with the electrification of all on-road transportation sectors. As part of a larger portfolio of policies supporting electric vehicle adoption, enacting a LCFS program that incentivizes the purchase and use of electric vehicle is critical to accelerating the shift to zero emission transportation technology needed for New York to reduce both for criteria and greenhouse gas emissions. Afterall, as you are well aware, transportation is New York's largest source of GHG emissions —approximately 35 percent and growing. This is

all the more important given the impact of pollution on public health issues, such as asthma and other respiratory and cardiovascular diseases, that are linked to more severe cases of coronavirus.

Rivian appreciates your recent decision to join 14 other states and the District of Columbia in an MOU to foster electric trucks. I encourage you to support A.5262-A (Woerner)/S.4003-A (Parker) as part of the broader vision you embraced in the recent MOU to reduce pollution and move New York to a self-sustaining market for zero emission medium- and heavy-duty vehicles.

Thank you again for your environmental leadership and we ask, in conjunction with the Clean Fuels NY coalition, that you please show your support of A5262-A/ S4003-A in our shared objective of transitioning to a more sustainable future. Rivian looks forward to working with New York in achieving these goals.

Sincerely,

A handwritten signature in blue ink, appearing to read "James C. Chen". The signature is fluid and cursive, with the first name "James" written in a larger, more prominent script than the last name "Chen".

James C. Chen, Vice President of Public Policy
Rivian Automotive, LLC



Spruce Haven Farm LLC

5004 White Road
Union Springs, NY 13160

10/2/20

The Honorable Andrew M Cuomo, Governor
The State of New York
Executive Chamber, State Capitol
Albany, NY 12224

Dear Governor Cuomo,

As a 2,000 cow dairy farmer, and a member of the Clean Fuels NY Coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will create a significant incentive for dairy farmers to harvest biogas, generated from dairy cow waste, and turn it into renewable natural gas (RNG) for the transportation sector. In addition, RNG can be used to decarbonize natural gas, further reducing New York's carbon footprint. The LCFS market incentives can be a game changer for New York's dairy industry, thus creating an additional revenue source for an agricultural sector under significant economic stress.

Adopting an LCFS that includes the environmental value of biogas co-digesting food waste with manure and amending the CLCPA to accept biogas as renewable energy from both manure and food waste will allow NYS to meet three important goals. Manure processed through an anaerobic digester significantly reduces methane emissions and creates renewable energy. Recycling food waste to recover the energy and nutrients reduces GHG emissions and preserves landfill space. Monetizing the environmental value of renewable energy produced from farm based anaerobic digestion will keep the carbon credits here in NYS instead of exported to California.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while

creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm, and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

NEDPA encourages you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Should you have any questions, please contact me at (315) 729-6359 or by email at gdyoung456@aol.com.

Thank you,

G. Douglas Young, Managing Member
Spruce Haven Farm LLC



September 9, 2020

Clean Fuel Standard Support Letter

The Honorable Andrew M. Cuomo
Governor of New York State
New York State Capitol Building
Albany, NY 12224

Dear Governor Cuomo,

My name is Steven Eisenberg and I'm writing on behalf of SRECTrade, Inc. SRECTrade provides environmental commodity management and transaction services to more than 2.0 GW of renewable energy capacity and electric vehicle assets across more than 165,000 projects nationwide. SRECTrade strives to bring transparency and equity to environmental commodity markets through education, technology and a volume-agnostic service. Our operations across the New England Power Pool, PJM and Western U.S. environmental commodity markets have allowed us to become the largest third-party environmental commodity management and transaction services business in the United States.

As a business operating nationally looking to expand into New York and a member of the Clean Fuels NY coalition, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

As a response to our growing operations in the California Low Carbon Fuel Standard (LCFS) market, we have expanded our team by nearly 20% and invested nearly \$1 million to date in our growth in California. Given the strong nature of the program, we anticipate this investment will grow substantially as we continue moving forward through 2030. Adopting a Clean Fuel Standard in New York will spur direct investment from SRECTrade in the state. We would anticipate a substantial hiring effort in the state to help us build our presence in the New York market. Depending on the stringency and size of the NY CFS program, we anticipate a similar investment profile in New York as we have made in California.

A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink that reads "Steven Eisenberg". The signature is written in a cursive, flowing style.

Steven Eisenberg, CEO
SRECTrade, Inc.



SUN HILL FAMILY FOUNDATION

August 10, 2020

Re: STATE SENATE AND ASSEMBLY LCFS SUPPORT LETTER

Dear Governor Cuomo;

My name is Lori Malloy and I'm writing on behalf of my family and the Sun Hill Family Foundation. As a Foundation Director residing in New York and a member of the Clean Fuels NY coalition, I urge you to support a Low Carbon Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Low Carbon Fuel Standard (LCFS) is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, an LCFS would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

Adopting an LCFS in New York will impact our operations directly, as our Foundation awards 'green' environment-related grants benefitting New York and its residents and neighbors every year.

An LCFS is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the LCFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the LCFS.

I encourage you to show your support for the low carbon fuel standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in blue ink that reads "Lori Malloy".

Lori Malloy

Director

Sun Hill Family Foundation

sun.hill@fred-french.com

September 3, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12244

**Re: S.4003-A, Parker/A.5262-A, Woerner
Establishes the low carbon fuel standard of 2019; such standard is intended to reduce carbon intensity from the on-road transportation sector by 20% by 2030, with further reductions to be implemented based upon advances in technology.**

Dear Governor Cuomo:

Tesla supports the adoption of a Clean Fuel Standard (CFS), an important tool in meeting the State's Climate Goals to reduce economy-wide greenhouse gas emissions 40 percent by 2030 and no less than 85 percent by 2050 from 1990 levels as required by the Climate Leadership and Community Protection Act (CLCPA), and addressing health and wellness concerns stemming from criteria air pollutant emissions. Climate change and pollution from the transportation and energy sectors are disproportionately impacting vulnerable communities, and a clean fuels policy can help compliment many of the important actions you've taken to reduce these climate and energy inequities. As a member of the Clean Fuels NY coalition, Tesla asks for your support of a CFS, such as is proposed by S.4003-A (Parker)/ A.5262-A (Woerner).

Tesla's mission is to accelerate the world's transition to sustainable energy through the deployment of electric vehicles and sustainable energy products, including battery storage and solar energy systems. Globally, Tesla has produced more than 1 million electric vehicles (EV) and has made global investments in developing and deploying a network of charging infrastructure to enable long-distance all-electric travel, our Supercharger network. Creating a seamless, convenient and affordable charging experience is key to enabling EV adoption providing consumer assurance that electricity fuel will be available when needed. In New York State, there are 48 Supercharger locations and a total of 419 Supercharger charging stalls. Supercharger equipment for worldwide consumption is manufactured at Tesla's Gigafactory in Buffalo, NY. Tesla also has an extensive Level 2 "Destination Charging" network with chargers

located at hotels, restaurants and shopping centers around the state. There are currently 446 Destination Charging locations and a total of 1046 chargers in New York.

A CFS is a technology-neutral, performance-based mechanism to reduce greenhouse gas emissions (GHG) from transportation fuels by requiring fuel manufacturers and importers to reduce the GHG emissions associated with the fuels they make and sell. A well-designed CFS will achieve deep GHG reductions by incentivizing the purchase and use of electric vehicles while providing the regulated industry with flexibility in meeting their goals. Importantly, CFS policy should also support and promote electricity as a transportation fuel, thereby driving increased adoption of electric vehicles and greater reductions in GHG and air pollutant emissions.

As New York faces an unprecedented health and budget crisis, a CFS would improve air quality and reduce GHG emissions from the transportation sector, the largest source of GHG emissions in the state, with little to no cost to state taxpayers. Adopting a well-designed CFS in New York that focuses on benefitting consumers and transitioning to lower-emitting fuels including clean electric vehicles provides a signal to charging providers and EV manufacturers to invest further in New York. Consumer benefits can include reducing the operating costs for fleet customers, thus making the total cost of ownership for heavy duty electric vehicles more economic and making New York a more attractive place for a national fleet to deploy their all-electric trucks.

A CFS is a critical tool in addressing criteria pollutants, the leading causes of respiratory disease, asthma, and cardiovascular disease among others. According to the American Lung Association's State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country. These emissions, and the associated damage to public health, tend to be unfairly concentrated in disadvantaged communities that suffer the consequences. These are the communities that the groundbreaking CLCPA was designed to protect.

New York's transportation sector surpasses the national GHG emissions average of 28 percent at approximately 36 percent, highlighting the importance of supporting policies that can mitigate additional risk. By creating a market-based regulatory solution, the state can reduce GHG

emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the CFS also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle charging network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of the California Low Carbon Fuel Standard.

Tesla encourages you to support a Clean Fuel Standard for New York, by supporting S.4003-A (Parker)/A.5262-A (Woerner). This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,



Zachary Kahn
Senior Policy Advisor

Cc: Senator Kevin Parker
Assemblymember Carrier Woerner
Beth Garvey
Jen Maglienti
Ali Zaidi
Amanda Lefton



November 17, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo,

Waste Management, Inc. (WM) operates the largest fleet of Class 8, industrial heavy-duty trucks in North America. Over a decade ago, we made a commitment to reduce our fleet's greenhouse gas emissions by transitioning from diesel to natural gas. Today, nearly 10,000 of our trucks are Compressed Natural Gas (CNG) trucks, and 45% of these trucks are running on renewable natural gas (RNG) – reducing emissions by over 80% compared to the trucks that they replace. Over the past decade, primarily as a result of our commitment to CNG trucks and RNG fuel, WM has reduced its fleet emissions by 36%.

As a company with a large collection footprint in New York State, we would like to urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker). WM has been a strong supporter of low carbon fuel standards in California, Oregon and Washington. As a result of successful programs in California and Oregon, 100% of our fleet in these states operate on RNG.

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell.

As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector at no cost to the state or taxpayers.

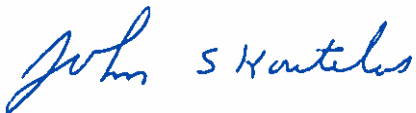
Adopting a Clean Fuel Standard in New York will support our effort to transition our New York State fleet to CNG trucks quicker, and to use RNG fuel in these trucks. With over 354 collection vehicles in the state, a low carbon fuel standard that includes all low carbon fuels would reduce emission from our fleet alone by over 100,000 Metric Tons per year in New York State.

A Clean Fuel Standard is a critical tool for reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their low carbon fuel standard.

Waste Management therefore encourages you to show your support for the Clean Fuel Standard by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce state transportation emissions, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in blue ink that reads "John Skoutelas".

John Skoutelas, Esq.
VP and National Director of Government Affairs
Waste Management

cc: Julie Tighe, President NYLCV & NYLCVEF

jtighe@nylcv.org

Susan Robinson,

WM Senior Director of Sustainability and Policy

srobinson@wm.com

Michael Jensen, WM Director of Federal Regulatory Affairs

mjensen1@wm.com

Amanda Lefton, First Secretary for
Energy and the Environment

Amanda.Lefton@exec.ny.gov



November 3, 2020

The Honorable Andrew M. Cuomo
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

RE: Support for A.5262-A (Woerner)/S.4003-A (Parker)

Dear Governor Cuomo,

On behalf of World Energy, I am writing in support of a Clean Fuel Standard for New York. As a member of the Clean Fuels NY coalition, Chair of the Low Carbon Fuels Coalition and a business who produces low carbon liquid fuels, I urge you to support a Clean Fuel Standard, such as is proposed by A.5262-A (Woerner)/S.4003-A (Parker).

A Clean Fuel Standard is a technology-neutral, performance-based standard that requires fuel manufacturers and importers to reduce the greenhouse gas emissions associated with the fuels they make and sell. As we face an unprecedented health and budget crisis, a Clean Fuel Standard would allow New York to improve air quality and clean up the transportation sector.

World Energy is a global supplier of biofuels, with seven biodiesel production facilities and one sustainable aviation (SAF)/renewable diesel (RD) facility, totaling over 300 million gallons of annual renewable fuel production capacity among its assets. Our SAF / RD facility is located in Paramount, California, and is undergoing a \$1 billion conversion from a traditional asphalt and petroleum refinery to a 100% renewable fuel facility. World Energy's investments in converting a California petroleum refinery to a renewable fuel production facility is a direct response to the state's Low Carbon Fuel Standard (LCFS) program.

As is the case with many other states, California's largest source of GHG emissions originates from the transportation sector, accounting for 39.9% of the state's GHG inventory; of which 28.1% is from passenger vehicles and 11.8% is from heavy-duty vehicles and other hard to decarbonize modes of transportation. With the support of the LCFS, World Energy has been able to provide low carbon fuels that yield significant GHG emission reductions, particularly in the heavy-duty sector. California's LCFS has successfully created a market for all alternative fuels and is critical in providing consumer choice, offering domestic fuels, and spurring innovations in transportation fuels.

Much to the effect of California's LCFS, the adoption of a Clean Fuel Standard in New York would drive new business investment in companies like ours by incentivizing technological innovations that reduce the carbon intensity (CI) of transportation fuels. World Energy has multiple biodiesel refineries on the East Coast, and the existence of a Clean Fuel Standard would allow World Energy to provide additional low carbon fuel to the New York transportation market, while simultaneously helping the state reach its climate goals. Furthermore, the implementation of a Clean Fuel Standard in New York would generate market appeal and incentivize World Energy to send other low carbon fuels, such as SAF and RD to the state.



A Clean Fuel Standard is a critical tool in reducing criteria pollutants in our air which contribute to significant public health issues, including asthma and other respiratory and cardiovascular diseases that are linked to more severe cases of coronavirus. According to the American Lung Association's annual State of the Air Report, more than 50 percent of New Yorkers live in areas with failing air quality and the greater New York City metropolitan region is consistently ranked in the top 10 cities with the worst air quality in the country.

Transportation is New York's largest source of GHG emissions—approximately 35 percent and growing. Cars and trucks, which rely overwhelmingly on petroleum-based fuels, represent a significant portion of New York's harmful air pollution. By requiring high polluting transportation fuel providers to purchase credits from low carbon fuel suppliers, the state can reduce greenhouse gas emissions and improve air quality, while creating in-state jobs, supporting regional economic development and reducing out-of-state payments.

By encouraging investment in the clean fuels market, the Clean Fuel Standard also has the potential to spur economic growth across New York. There is immense economic potential for the production and use of low carbon fuels in New York, from jobs to expand the electric vehicle network to converting sewage, farm and food waste to clean, renewable fuels. In California, 38,000 jobs have been created to date as a result of their Clean Fuel Standard known as the Low Carbon Fuel Standard (LCFS).

I encourage you to show your support for the Clean Fuel Standard, by supporting [A.5262-A (Woerner)/S.4003-A (Parker)]. This policy is a proven solution to reduce transportation emissions in New York, improve air quality and drive investment into new industries.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Sherbacow", with a long, sweeping flourish extending to the right.

Bryan Sherbacow
Chief Commercial Officer
World Energy