



The Honorable Representative Caddy McKeown
Chair, Oregon House Committee on Transportation Policy
State Capitol
Salem, OR 97301

February 8, 2017

RE: STRONG SUPPORT: HB 2462: WEIGHT EXEMPTION FOR NATURAL GAS VEHICLES

Dear Representative McKeown:

On behalf of Clean Energy, I would like to express strong support for HB 2462, a bill providing for a weight exemption for natural gas vehicles up to 2,000 lbs.

As North America's largest provider of natural gas and renewable natural gas (or biogas) transportation fuel, we have a deep understanding of the growing marketplace for these fuels. Our portfolio includes 589 stations nationwide, with 4 stations alone in Oregon. These stations provide compressed natural gas (CNG) and/or liquefied natural gas (LNG) vehicle fuel.

Already used as a clean source of energy around the world, natural gas is abundant and proven to be a cost-saving alternative fuel. Natural gas for transportation fuel strengthens our economy with lower fuel costs, increases our energy security, and significantly benefits our environment by reducing carbon emissions and smog-forming NOx emissions by up to 23% and 35%, respectively, relative to diesel fuel. Carbon emissions are reduced even further – by 90% - when renewable natural gas is used instead of diesel.

This bill would allow for an increase in weight for heavy duty natural gas vehicles (NGV). Recent federal legislation – Fixing America's Surface Transportation (FAST Act) – raised the limit to 82,000 pounds for interstate highways, and now each state is provided the opportunity to increase this weight limit on intrastate roads and highways. This is because vehicles powered by natural gas weigh more due to heavier tanks and fuel relative to diesel vehicles. Typically, the maximum weight limit for a heavy duty vehicle on public roads is 80,000 pounds (includes trailers), but heavy duty NGVs that run at full weight capacity require as much as 82,000 pounds. Ten states last year passed similar legislation, with more expected this year.

Also, with the exemption, NGVs would haul the same maximum weight in goods as for diesel vehicles, and thus there would be fewer NGV trips than now to carry the same amount of goods, thus reducing wear and tear on roads and highways.

Also, any impact on highway and road pavement should be minimal because:

- The roads are built to carry much heavier loads than just an additional 3% increase in 2000 lbs.;
- The extra weight is spread between the tractor steer and drive axles and is not in a concentrated area;
- The trailer load weight would be the same whether the truck was powered by natural gas or diesel;

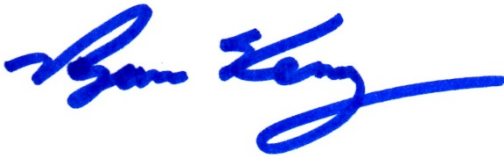
- By allowing a NGV to carry the same weight amount for goods transported, actual NGV truck trips would be reduced (significant in oil and gas production and refining areas);
- The conversion of fleets to run on natural gas will take time and not be an immediate impact;
- Exemptions do exist for loads such as coal that may be as much as 10,000 lbs. heavier.

There should be no safety impact of the extra weight due to several factors:

- The extra weight is placed on the tractor steer and drive axles, not the trailer(s);
- The extra weight is placed on the tractor axles, wheels and tires, which already have specifications to accommodate additional weight;
- The American Trucking Association indicates that current axle and tire weight limits are in place to prevent pavement deterioration and are not related to safety.

Thank you for considering this information. Again, **please vote AYE for HB 2462.**

Sincerely,



Ryan Kenny
Senior Public Policy & Regulatory Affairs Advisor
Clean Energy