



TOYOTA MOTOR NORTH AMERICA, INC.
601 THIRTEENTH STREET, NW - SUITE 910 SOUTH
WASHINGTON, DC 20005
TEL: (202) 775-1707

Air Liquide USA, LLC
2700 Post Oak Blvd
Houston, TX 77056
Office: 713-402-2153

May 22, 2015

Mr. John Rhodes, President
NYS Energy Research Development Authority
17 Columbia Circle
Albany, NY 12203-6399

RE: Regional Greenhouse Gas Initiative – State Plan Amendment

Dear Mr. Rhodes:

Please accept the following comments of our respective companies on the Proposed RGGI Operating Plan Draft Amendment. We recognize and support the intent of the 2015 Operating Plan toward the “pursuit of the State’s carbon reduction goals by:

- Reducing New York’s greenhouse gas emissions (GHG) through energy efficiency and renewable energy projects
- Building the State’s capacity for long-term carbon reduction
- Empowering New York communities to reduce carbon pollution, and transition to cleaner energy
- Stimulating entrepreneurship and growth of clean energy and carbon abatement companies in New York
- Creating innovative financing to increase adoption of clean energy and carbon abatement in the State.”¹

We write to request a new consideration of transportation innovations that will be available to New York consumers beginning in 2016. Toyota and other carmakers are bringing to market hydrogen fuel cell vehicles that will dramatically reduce GHG emissions and the carbon footprint of motor vehicles. The first-ever production fuel cell cars use hydrogen as fuel and emit only water vapor. Approximately 20% of the world’s CO₂ emissions from energy sources are generated by the transportation sector.

¹ New York’s Regional Greenhouse Gas Initiative Operating Plan Amendment for 2015(April 22, 2015 Draft)

As these vehicles come to market, a new fueling infrastructure must also be created. Air Liquide and Toyota have announced a collaboration to develop a fully-integrated hydrogen fueling infrastructure in the Northeast U.S., which will include a network of state-of-the-art hydrogen fueling stations. But much more needs to be done, and we need State support to expand this network over time.

Our companies request an expansion of efforts and resources under the Transportation Research program, to support the establishment of hydrogen fueling stations. This initiative is consistent with the goals of the Multi-State ZEV Action Plan announced by the Governor last year, as well as the Transportation Research program's directive to otherwise "increase the availability of new technologies, products, systems and services that provide cost-effective GHG reductions in the transportation sector."

Toyota and other carmakers are pursuing multiple technology paths to reduce vehicle fuel consumption and greenhouse gas emissions. Efforts to improve fuel economy and reduce GHGs have become more aggressive with the adoption in the United States of new fuel economy and GHG emissions standards for passenger cars and light trucks through the 2025 model year. The new vehicle fleet must meet a GHG standard of 250 grams of CO₂ per mile by 2016, equivalent to a Corporate Average Fuel Economy (CAFE) standard of 35.5 miles per gallon; by 2025 cars and light trucks are required to yield a combined 54.5 mpg. While overall compliance is based on a fleet average, each vehicle has a fuel economy/GHG target based on its footprint. Fuel cell vehicles will greatly aid in carmakers' ability to meet these aggressive new targets for limiting CO₂ and reducing greenhouse gas (GHG) emissions.

We are grateful for this opportunity to comment on the Proposed RGGI Operating Plan Draft Amendment, and would be pleased to provide whatever additional information we can in this regard.

Respectfully submitted,



Stephen Ciccone
Group Vice President, Government Affairs
Toyota Motor North America, Inc.



Michael Rosen
Vice President, Corporate Communications & Public Affairs
Air Liquide USA, LLC

enclosure

About Air Liquide

World leader in gases, technologies and services for Industry and Health, Air Liquide is present in 80 countries with more than 50,000 employees and serves more than 2 million customers and patients. Oxygen, nitrogen and hydrogen have been at the core of the company's activities since its creation in 1902. Air Liquide's ambition is to be the leader in its industry, delivering long-term performance and acting responsibly.

Air Liquide's revenues amounted to € 15.4 billion in 2014, and its solutions that protect life and the environment represented more than 40% of sales. Air Liquide is listed on the Paris Euronext stock exchange (compartment A) and is a member of the CAC 40 and Dow Jones Euro Stoxx 50 indexes.

About Toyota

Toyota Motor Corporation is the twelfth-largest company in the world by revenue and has approximately 338,875 employees worldwide. In 2012, Toyota became the largest automobile manufacturer in the world. Within New York State, there are currently 76 dealerships, with 5,738 employees. In addition, Toyota Financial Services maintains a service center in Middletown, NY, which provides financial and insurance products to Toyota dealers and their customers. To date, Toyota has donated over \$700 million to nonprofits across the U.S., including over \$68.8 million in contributions to New York organizations.

TOYOTA'S PATH TO A LOW CARBON FUTURE



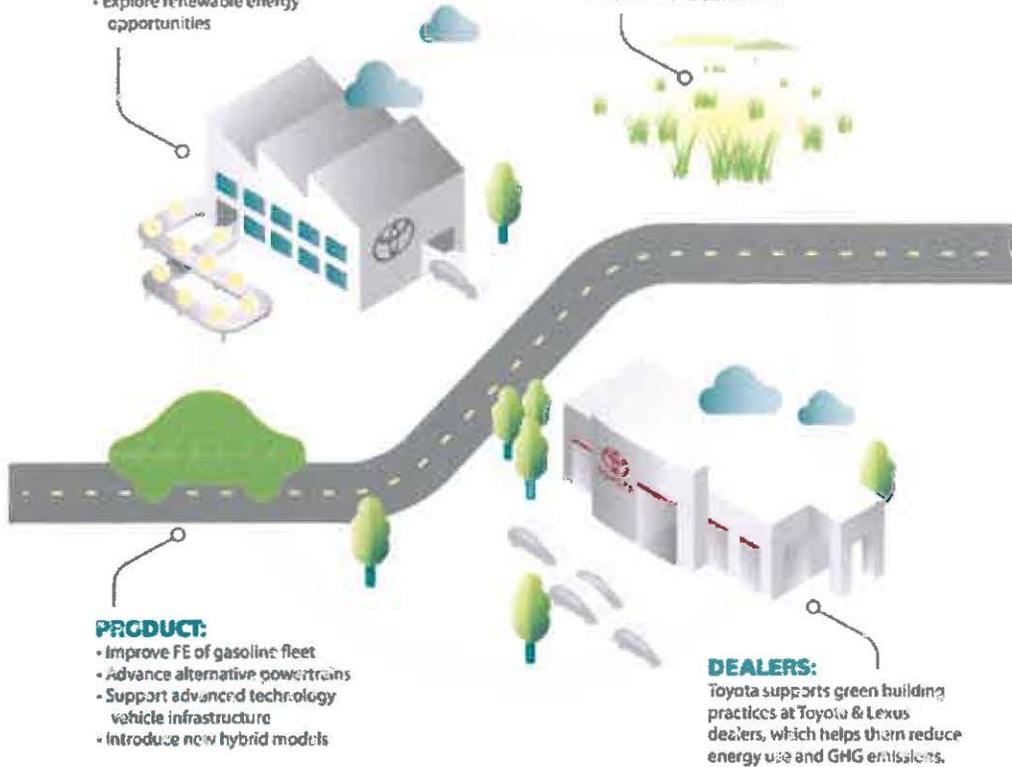
The impacts of climate change – floods, droughts, changes to weather patterns – are being felt around the globe. Approximately 20% of the world's total CO₂ emissions from energy sources are generated by the transportation sector. Toyota considers responses to help prevent global warming to be a priority management issue. In North America, Toyota is working to reduce the carbon footprint of our products and activities and engaging with stakeholders to build a low carbon future. Find out more about our efforts at www.toyota.com/environmentreport2014/carbon.

OPERATIONS:

- Conserve energy
- Reduce GHG emissions
- Explore renewable energy opportunities

KEY PARTNERSHIPS:

- FirstElement Fuel
- NREL
- Nexus Energy & AlabamaWise
- Yellowstone National Park



PRODUCT:

- Improve FE of gasoline fleet
- Advance alternative powertrains
- Support advanced technology vehicle infrastructure
- Introduce new hybrid models

DEALERS:

Toyota supports green building practices at Toyota & Lexus dealers, which helps them reduce energy use and GHG emissions.

TOYOTA'S DESIRED PROGRESS ACROSS EACH OF THE FOLLOWING:

	MPG (Toyota U.S. fleet average)	g CO ₂ /mile (Toyota U.S. fleet)	MT CO ₂ e/vehicle (operations, stationary sources)	MW Renewable Energy Capacity	LEED® Certified Dealers
THEN - 2002	26.1	340	1.24	0	0
NOW - 2014	33.4	265	0.69	5,500	42

FUTURE - 2021

Toyota is working on our next five-year environmental action plan and is developing targets that will further reduce the carbon footprint of our products and activities; and expand the positive impacts of our outreach efforts.