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DATE	May 19 2006
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May 19, 2006

The Honorable James D. Boyd
Commissioner and Presiding Member
Transportation Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

06-IEP-1A

The Honorable Jackalyn Pfannenstiel
Vice-Chair and Associate Member
Transportation Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioners Boyd and Pfannenstiel:

The California Electric Transportation Coalition (CalETC) is pleased to provide the following comments on the Committee Scoping Notice on Preparation of the State Plan to Increase the Use of Alternative Transportation Fuels (Docket No. 06-AFP-1).

1. Will the proposed Alternative Fuels Plan provide an actual “Plan” describing how the alternative fuel goals will be met?

The Committee Scoping Notice describes three major tasks in preparing the Alternative Fuels Plan. The first two are: (1) to evaluate the various alternative fuels; and (2) to set goals for increased alternative fuel use in 2012, 2017, and 2022. The third task is to “Recommend policies to ensure alternative fuel goals are attained”. The language in these three tasks is unclear whether there will be a true “Plan” describing the specific steps that specific state agencies will undertake to achieve the stated goals (possibly with recommendations to the Governor and Legislature where additional authority or programs are needed). A true “Plan” should do more than just “recommend policies”; it should provide a detailed roadmap describing specific strategies that will be undertaken by identified agencies, and in some cases by other parties.

We note that the common definition of a “Plan” is more specific and complete than the tasks currently described in the Scoping Notice:

“A **plan** is a proposed or intended method of getting from one set of circumstances to another. They are often used to move from the present situation, towards the achievement of one or more objectives or goals.”¹

◆
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Executive Director

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Legislative Director

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A non-profit association
promoting cleaner, healthier air
through the development and use of
zero-emission electric vehicles,
hybrid electric vehicles,
electric mass transit buses and rail.

¹ Wikipedia.org

We also note that Governor Schwarzenegger called for a more detailed Plan in his comments on the 2003 Integrated Energy Policy Report and the 2004 Update of the Integrated Energy Policy Report:

*“Adopt a goal of increasing the use of non-petroleum fuels to 20 percent of on-road fuel consumption by 2020 and 30 percent by 2030 based on **identified strategies that are achievable and cost-beneficial**. Simply adopting a goal is not enough – the means identified are insufficient to reach the goal.” “To this end, the Energy Commission should take the lead in crafting a workable long-term plan ... that will result in significant reduction of gasoline and diesel use and increase the use of alternative fuels so that the State is working toward a set or realistic, achievable objectives with identifiable and measurable milestones.”²*

We also note that several recent State government reports have been very specific about how state goals or objectives will be met, describing specific actions and responsibilities of individual state agencies and others. These reports include the Climate Action Team Report, and the Goods Movement Action Plan. Further, CalETC has previously highlighted the California State Implementation Plan for Air Quality, and stated that California needs a similarly detailed Plan for the reduction of petroleum usage and the increased use of alternative fuels. California has greatly improved air quality by going after many, many sources of emissions, both large and small. There is no “silver bullet” to quickly improve air quality, and the same is true with the reduction in petroleum dependence and increased use of alternative fuels. We will need to employ many strategies, in many areas, each making small, but significant progress – that when aggregated over time will lead to the achievement of our goals. But we need a specific and detailed plan to do this. We recommend that the Alternative Fuels Plan emulate these more specific and detailed models.

We recommend that the Scoping Notice be clarified by the Committee to indicate that the Alternative Fuels Plan will describe specific steps and strategies that state agencies and others will undertake to achieve the stated goals (possibly with recommendations to the Governor and Legislature where additional authority or programs are needed).

2. Will the proposed Alternative Fuels Plan include opportunities to displace petroleum fuels in the off-road and non-road sectors?

The Scoping Notice is vague on this issue, although it does note that the use of alternative fuels to reduce truck idling and for goods movement at ports will be included.

The consumption of petroleum fuels (as well as air pollution and climate change gases) in the non-road and off-road sectors is very large. Petroleum displacement in these sectors serves the same purposes and goals as displacement in the on-road sector. These issues were also identified in the 2005 IEPR.³

² Letter from Governor Arnold Schwarzenegger to the Legislature, attachment: Review of major Integrated Energy Policy Report Recommendations, August 23, 2005, page 11.

³ 2005 Integrated Energy Policy Report, California Energy Commission, page 21.

As stated above, there is no “silver bullet”, so California will have to look to all sectors for opportunities to reduce petroleum and increase alternative fuels.

For these reasons we recommend that the Alternative Fuels Plan include consideration of opportunities to reduce petroleum fuels in the off-road and non-road sectors. In particular we urge the Committee and staff to include consideration of the following categories, where there is data available today: truck/transport refrigeration units; industrial lift trucks; tow tractors and industrial tugs; turf trucks; rider sweepers/scrubbers/burnishers; airport ground support equipment; and lawn and garden equipment. We have previously provided data to the CEC on the existing and achievable petroleum displacement (and emissions reductions) in these categories, and we would be pleased to do so again. The results are significant, and the benefits more likely to be achieved than many other strategies.

CalETC wants to thank the Transportation Committee and CES staff for the opportunity to provide these comments. If you would like to discuss these further, please do not hesitate to call me at (916) 551-1943 or 441-0702.

We look forward to working with you on this important document.

Sincerely,

A handwritten signature in black ink, appearing to read "David L. Modisette". The signature is fluid and cursive, with a large initial 'D' and 'M'.

DAVID L. MODISETTE
Executive Director

cc: Lorraine White