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California Energy Commission
Docket Office
Attn: Docket 06-AFP-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

DOCKET	
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DATE	JUN 05 2007
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Subject: Docket number 06-AFP-1 Alternative Fuels Transportation Plan, Comments May 31st Workshop, Pertaining to OBD Compliance & Retrofit Alternative Fuel Systems.

IMPCO Technologies, subsequent to our participation in the May 31 CEC/CARB joint workshop for the Alternative Transportation Fuels Plan, would like to reiterate our comments made to the California Energy Commission (CEC) and the California Air Resources Board (CARB), relating to the OBDII regulations currently employed in the State of California, for the Commission's consideration.

Firstly, IMPCO Technologies fully supports CARB's position with the current level of OBDII requirements for Original Equipment Manufacturers (OEM's), and agrees the standardized features of OBDII, including communicating with generic scan tools, are important elements of OBD II, ensuring emission-related malfunctions can be serviced by any facility.

The salient point here being "emission-related malfunction" and minimizing the inconvenience to the vehicle operator, to ensure a prompt repair.

The OBDII model is extremely complex and without collaboration from the vehicle OEM, in providing proprietary information, is virtually impossible to integrate and communicate with generic scan tools. This is evidenced by the lack of Propane and CNG alternative fuel vehicles currently available in California.

Our proposal for retrofit systems is to remove any potential of an "emissions-related malfunction" being caused by the presence of our alternative fuel systems on a vehicle. Whereby, if one of our component fails or malfunctions, the vehicle shall default to gasoline operation before the OEM MIL Lamp has illuminated and will not run on the alternative fuel until the malfunction has been repaired.

In this case, a fault with our system is not and will never be an "emissions-related malfunction", but rather a service issue. The vehicle will never be presented to a repair shop with the OEM MIL Lamp illuminated as a result of the presence of our system on the vehicle; however it may be presented to the repair shop as non

operational on the alternative fuel. Again, not an "emissions-related malfunction", but rather a service issue and therefore the requirement for generic scan tools is not applicable and the only risk is our customer's satisfaction.

Once the alternative fuel system has recognized a component failure, it immediately reverts to gasoline operation and notifies the vehicle operator by the illumination of an "Alternative Fuel Unavailable" Lamp. In this case, the repair service is carried out by a qualified and trained Propane/CNG technician. The OEM OBD II system remains fully active, however the MIL Lamp is not illuminated as the switch from the alternative fuel to gasoline takes place prior to the OEM OBD recognizing an "emission related malfunction".

Adopting this strategy for retrofit Bi-Fueled Propane & CNG alternative fuel systems, enables the application of a wide range of production released vehicle types and models.

Currently our company sells 12,000 systems a month world wide of this particular technology, and produces approximately 80,000 injectors each month.

21 OEM's in 12 countries employ our sequential injection system, offered as either a factory option, delayed OEM or OEM endorsed program.

Australia with a population of 20.5 million people and following European regulation, added 80,000 new autogas (LPG) vehicles in 2006, and is on target for 100,000 new autogas vehicles in 2007. Australian vehicles consumed 1.2 millions tons of LPG in 2006 with an expected growth of 3%.

Italy with a population of 60 million people, expects to add approximately 120,000 new alternative fuel vehicles in 2007, a combination of LPG or CNG.

US EPA has approved our strategy for OBDII equipped vehicles, which is based on the European regulation R115 for master & slave retrofit systems. The first of four vehicle platforms is currently at EPA undergoing confirmatory testing, for 2008 EPA certification.

In concluding, IMPCO would like to invite CEC/CARB staff to further discuss LPG vehicles projections, as we feel if regulations are adopted that ensure quality installations and products while not restricting market access, based on our experience the Californian market has a far greater potential than currently projected.

IMPCO Technologies is prepared to invest in demonstrating our strategy for OBDII equipped vehicles, on the provision that CEC and CARB allow commercialization of the system in California following a successful demonstration.

Regards,

A handwritten signature in black ink, appearing to read 'Rob Mercer', with a long horizontal flourish extending to the right.

Rob Mercer - Business Manager (responsible) - IMPCO Technologies, Inc.

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