

DOCKETED

Docket Number:	17-ALT-01
Project Title:	2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
TN #:	221806
Document Title:	2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
Description:	N/A
Filer:	System
Organization:	California Refuse Council/Veronica Pardo
Submitter Role:	Public
Submission Date:	11/17/2017 10:46:34 AM
Docketed Date:	11/17/2017

Comment Received From: Veronica Pardo

Submitted On: 11/17/2017

Docket Number: 17-ALT-01

2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

Additional submitted attachment is included below.



JOINT STATE OFFICE

November 17, 2017

VIA WEBSITE

<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=17-ALT-01>

Re: 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

The California Refuse Recycling Council (CRRC) is a trade association comprised of over 100 refuse and recycling companies across the state committed to superior management of waste resources, including composting, recycling, anaerobic digestion (AD) and renewable energy production. We thank you for the opportunity to submit comments on the 2018-2019 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program.

We are writing to recommend that the Natural Gas Vehicle Incentive Program (NGVIP) continue and not be merged into the Advanced Freight and Fleet Technologies program. The waste and recycling industry benefits greatly from the NGVIP as one of the primary subscribers. This program is critical to meeting state policies regarding recycling goals and emission control efforts, especially as we move our fleets off diesel and into cleaner burning natural gas.

While we recognize the program is currently undersubscribed, there are several issues that would enhance the program now and into the future.

First, the program had significant start-up issues and lag time for applicants. Many are still having issues with the website and reservation process. Data collection has also been time-consuming for applicants and funding has not always been available at the time of application. More than anything, this is a process issue that is causing viable applicants to not have access to potential funding. This issue, once resolved, will lead to accelerated participation in the future.

Second, we recommend the incentive be increased to cover the full differential cost in purchasing a new natural gas vehicle. Increasing the incentive amount, if possible, would stimulate higher interest.

Third, we recommend adjusting the vehicle cap limit if this would allow for better distribution of incentive money.

Finally, we highly recommend that you continue the NGVIP, but make appropriate adjustments where necessary to improve on the reservation process. The waste and recycling industry is already underway in moving toward important greenhouse gas reduction goals, including the diversion of organics from CA landfills. Many are utilizing organic waste to create renewable natural gas to fuel truck fleets. The NGVIP is a particularly important program for the waste and recycling industry, and one that supports California's ambitious environmental goals.

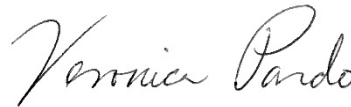
With better technology coming online, like the new low-NOx Cummins Westport 11.9-liter engine, demand for this program will continue to grow. We urge you to refine this program and improve upon any issues, not simply do away with the program or reassign funding another program not focused on this important sector.

Please do not hesitate to contact the CRRC regulatory team with any questions or concerns. We welcome the opportunity to discuss this further with you and will be available as the program discussion evolves. Thank you for your consideration.

Sincerely,



Kathryn Lynch
Regulatory Affairs



Veronica Pardo
Regulatory Affairs

cc: CRRC State Executive Committee Members