



Celebrating 25 Years of Fuel System Excellence!

June 7, 2011

Attn: Alternative and Renewable Fuel and Vehicle Technology Program  
California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 10-ALT-1  
1516 Ninth Street  
Sacramento, CA 95814-5512

Reference: Docket Number 10-ALT-1, Advisory Committee

We are writing to comment on the 2011-2012 CEC Investment Plan. We want to encourage the CEC to provide incentive money to convert any model year CARB compliant vehicle from gas to propane. Currently the incentive money is only provided to new untitled CARB compliant gas vehicles.

Roush and others are working with CARB to obtain Executive Orders for converting older model year gas vehicles to propane. Soon we will see CARB Executive Orders for 2008, 2009 and 2010 model year gas vehicles. We strongly believe that once the fleet customers convert one of their new 2011 model year vehicles from gas to propane, they will want to convert older compliant vehicles in their fleet. CEC should encourage those conversions by offering the same incentive program that is currently offered for new compliant vehicles.

In addition to accelerating the amount of vehicles that will be converted to propane per year in California, it will also produce new jobs for Californians. Roush and others have set up authorized installation facilities in California. Each conversion of a Roush LPI (liquid propane injection) system takes approximately 6 hours. Therefore, we can expect approximately 0.75 of an employee workday for each vehicle conversion that is done in California. The more vehicles that can be converted in California, the more people we can hire.



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To further convince CEC to provide incentives for conversion of older model year CARB compliant gas vehicles, we urge you to look at the Virginia Clean Cities propane conversion project. The goal of this program is to convert 1,189 used vehicles from gas to gas/propane. They are expected to displace more than 4.4 million gallons of gasoline and reduce 4,400 tons of airborne pollutants per year, according to the DOE Clean Cities Emissions Benefit Tool.

The Project Manager of the Virginia Clean Cities propane conversion project is:

Peter Denbigh  
Virginia Clean Cities Coalition

P: 540.466.4510  
F: 540.568.8933  
<http://www.usepropaneautogas.com/>

A public report of the Virginia Clean Cities propane project will be available shortly, and we urge you to read it. We also urge you to commit more incentive money for conversion of all model year California compliant vehicles from gasoline to propane.

Sincerely,

Bill Gaines  
Chairman, Transfer Flow Inc.



## The Southeast Propane Autogas Development Program

The Southeast Propane Autogas Development Program is a large-scale, groundbreaking alternative fuel project aimed at building propane Autogas infrastructure in the Southeast United States and encouraging public and private fleets to adopt propane Autogas. The Program will convert 1,189 vehicles from conventional gasoline to propane Autogas; implement at least 17 propane Autogas refueling stations along high-traffic routes; and launch a wide-reaching communications campaign to increase awareness and usage of propane Autogas in the Southeast.

In August 2009, the U.S. Department of Energy awarded \$8.6 million in American Recovery and Reinvestment funds to the Virginia Department of Mines, Minerals and Energy to execute the project. Administered by Virginia Clean Cities at James Madison University, the project will be deployed by Alliance AutoGas in nine southeast states – Maryland, Virginia, Tennessee, South Carolina, Georgia, Florida, Alabama, Mississippi and Louisiana. All of the vehicle conversions will be complete by March 2011 and the project will be funded through August 2013.

The 1,189 vehicles are expected to displace more than 4.4 million gallons of gasoline and reduce 4,400 tons of airborne pollutants per year, according to the DOE Clean Cities Emissions Benefit Tool.

Alliance AutoGas is working with the following fleets on this project:

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| ○ ABS Vans – Fredericksburg, VA               | ○ Lewis Pest Control – Thomasville, AL   |
| ○ Barrow County Sheriff – Winder, GA          | ○ Limousine Livery – New Orleans, LA     |
| ○ Blossman Gas – Ocean Springs, MS            | ○ Muscogee County Sheriff – Columbus, GA |
| ○ Carroll County Sheriff – Carrollton, GA     | ○ Pickens County – Pickens, SC           |
| ○ Cobb County – Marietta, GA                  | ○ Red Top Cab – Arlington, VA            |
| ○ Greenville County – Greenville, SC          | ○ Veolia Transportation – Baltimore, MD  |
| ○ James Madison University - Harrisonburg, VA | ○ Vestavia Hills – Vestavia Hills, AL    |
| ○ Kingsport – Kingsport, TN                   |  |

Alliance AutoGas is providing the vehicle conversion systems, leading the vehicle conversion training, implementing the refueling infrastructure, and providing the propane Autogas fuel supply for this project. Alliance was chosen for the project because of its turnkey solution that includes vehicle conversions, fueling and technical support, and because of its range of EPA-certified propane AutoGas conversion systems for common fleet vehicle platforms. The Alliance AutoGas founding partners, Blossman Gas, Inc. and American Alternative Fuel, are leaders in the propane AutoGas industry. Blossman Gas is the largest independent propane distributor in the U.S. and American Alternative Fuel is an alternative fuel system specialist that works closely with the EPA to ensure that the conversion systems meet their rigorous testing standards.