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|-------------------------|---|
| <b>Docket Number:</b>   | 19-ALT-01   |
| <b>Project Title:</b>   | 2020-2021 Investment Plan Update for the Clean Transportation Program         |
| <b>TN #:</b>            | 232591  |
| <b>Document Title:</b>  | Suburban Propane Partners, L.P. Comments - CEC Comments from Suburban Propane |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | Suburban Propane Partners, L.P.   |
| <b>Submitter Role:</b>  | Public  |
| <b>Submission Date:</b> | 3/30/2020 2:39:14 PM  |
| <b>Docketed Date:</b>   | 3/30/2020   |

*Comment Received From: Suburban Propane Partners, L.P.  
Submitted On: 3/30/2020  
Docket Number: 19-ALT-01*

**CEC Comments from Suburban Propane**

*Additional submitted attachment is included below.*

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March 30, 2020

**VIA ONLINE COMMENT SYSTEM**

Mr. David Hochschild  
Chairman, California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

***Re: Comments on Draft Staff Report, 2020-2023 Investment Plan Update for the Clean Transportation Program***

Dear Chairman Hochschild:

These comments are submitted on behalf of Suburban Propane Partners, L.P. (“Suburban”) regarding the California Energy Commission’s (“CEC”) *Draft Staff Report, 2020-2023 Investment Plan Update for the Clean Transportation Program* in CEC Docket No. 2019-ALT-01. California has long been a national leader setting strong environmental standards in the transportation sector. The solutions California uses to meet the State’s clean energy transportation goals will once again lead the way for many other states.

Suburban urges the CEC to consider all viable and cost-effective clean energy and transportation solutions for reducing methane, greenhouse gas, and NOx emissions in California’s energy transportation plan. These emissions can contribute to climate change and poor air quality, and significantly impact human health. Suburban urges any clean transportation plan adopted by the CEC include:

- 1) renewable liquid biofuels as part of the long-term solution for a clean energy transportation future, and
- 2) the use of propane autogas as an immediately available clean alternative fuel.

**I. RENEWABLE LIQUID BIOFUELS**

Innovative Renewable low carbon-intensive-fuels are doubly beneficial to California’s environmental goals when the feed stock for those fuels comes from the dairy and agriculture waist stream. The dairy and agriculture sectors are approximately 60% of California’s methane emissions. Using this waste stream to create renewable bio-propane and renewable bio-dimethyl ether (bio-DME) lessens the environmental impact of the dairy and agriculture sector. When

renewable bio-propane and bio-DME are used to replace traditional fossil transportation fuels the environmental footprint of the transportation sector also benefits.

Currently, in California, there is production of bio-propane and bio-DME. This is a small but fast-growing sector of the biofuels market. Additionally, the State has clean renewable bio-propane and bio-DME being consumed by transportation vehicle fleet operators including municipal fleets and delivery companies. Including clean renewable bio-propane and bio-DME in the CEC's *2020-2023 Investment Plan Update for the Clean Transportation Program* will incentivize the future growth of this market and provide important additional clean fuel options to Californians.

## **I. PROPANE AUTOGAS**

Propane autogas is a clean-burning, cost-effective, safe, fuel that is a viable alternative for medium and heavy-duty vehicles for which no mass market production electrical vehicles currently exist. Autogas vehicles emit 12% less carbon dioxide, 20% less nitrogen oxide, and 60% less carbon monoxide than gasoline-powered vehicles. Further autogas vehicles reduce greenhouse gas emissions by 15% compared to diesel vehicles and, unlike diesel, autogas has no particulate matter emissions and autogas vehicles significantly improve air quality over diesel vehicles.

Unlike diesel engines, autogas engines require less oil, no additional filters, and no costly emission fluids. Propane autogas vehicles deliver the same horsepower, torque, and towing capacity as gasoline and diesel vehicles and autogas engines last two to three times longer than diesel or gasoline engines. Commercially available autogas vehicles are in production and can immediately replace dirtier diesel and gasoline vehicles. Medium and heavy-duty electric vehicles are still in the very early stages of development and will not be ready for mass production for several years. Propane autogas can serve as an immediately available clean alternative fuel to significantly reduce harmful emissions from gasoline and diesel vehicles.

These comments are respectfully submitted on behalf of Suburban. If you have any questions or would like any additional information, please do not hesitate to contact me directly.

Sincerely,



M. Douglas Dagan