

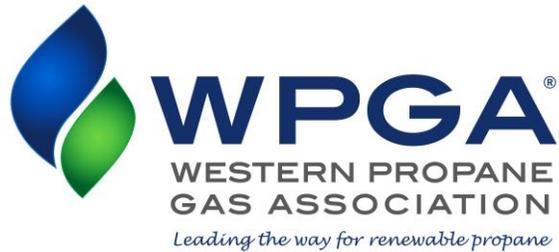
**DOCKETED**

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<b>Project Title:</b>	2020-2021 Investment Plan Update for the Clean Transportation Program
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*Comment Received From: Western Propane Gas Association  
Submitted On: 10/14/2020  
Docket Number: 19-ALT-01*

**WPGA Ltr Docket No 19-ALT-01 Lead Commissioner Report - 2020-2023 Investment Plan Update for the Clean Transportation Program**

*Additional submitted attachment is included below.*



October 14, 2020

David Hochschild, Chair  
California Energy Commission  
Docket Unit, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**SUBMITTED VIA EMAIL**

**RE: Docket No. 19-ALT-01 Lead Commissioner Report - 2020-2023 Investment Plan Update for the Clean Transportation Program – Revised September 2020**

Dear Chair Hochschild and Commissioners:

Thank you for the opportunity to comment on the Lead Commissioner Report - 2020-2023 Investment Plan Update for the Clean Transportation Program (Report), revised in September. The Western Propane Gas Association (WPGA) seeks to be a valuable contributor in both the development of this plan and the policies and procedures that may emerge as a result of these discussions.

While each fuel source has its own advantages, many fleets across California and the nation choose propane to power their trucks. Propane provides fleet owners with a low emission, low cost, and high-energy fuel without compromising performance, range or engine life. We advocate supporting all low carbon solutions, based on the full fuel cycle carbon footprint to address environmental challenges. Propane provides reliability, affordability, stability and resiliency, all key when looking to transition California's transportation sector to cleaner fuels.

WPGA understands the urgent need to reduce greenhouse gas (GHG) and NO<sub>x</sub> emissions and the complex nature of finding solutions that balance diverse stakeholder needs in the transportation sector. While WPGA believes the development of zero-emission technology is an important strategy, we also believe that near-zero (e.g., engines that meet the 0.02 g/bhp-hr NO<sub>x</sub> levels) technologies are an overlooked and important pathway to achieving the goals outlined in the Report. WPGA is aware of and understands the current financial crisis that California and local jurisdictions are facing, however, we also believe it is critical to continue funding near-zero fuel production and supply technologies at the originally proposed amount for 2020-2021 and beyond even the 2023 date.

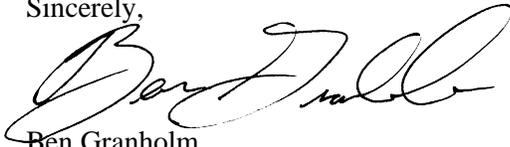
The propane industry has and is investing heavily in renewable propane, derived from waste-based feedstocks. There is currently enough renewable propane available today to replace 10% of the fossil propane currently consumed in the transportation sector. Furthermore, our industry is committed to 100% renewable propane in California's transportation sector by 2030. The carbon intensity for renewable propane is on par with that of electric and including funding for renewable propane in the proposed Investment Plan can play an important role by sending a signal to the market of the importance of in-state production of renewable propane and the continued production of low-NO<sub>x</sub> engines to help reduce greenhouse gas emissions for decades to come.

The use of renewable propane, for example, in near-zero propane trucks significantly reduces carbon emissions and NOx emissions that remain to be an important focus in many areas of California. Renewable propane is completely fungible with conventional propane, alleviating the need to invest in additional infrastructure for deployment. Moreover, near-zero propane technology is the most cost-effective and versatile replacement to diesel currently available.

The need for energy diversity remains vital in all sectors of our transportation network. WPGA strongly encourages the Board to think holistically on how to best invest and regulate clean technologies to ensure the most significant GHG reduction impact and that the Investment Plan should focus on the emissions reduction goals based on a complete energy lifecycle basis. Climate change and decarbonization is a complex challenge that requires deployment of all clean energy sources. Wind, solar, and other renewable fuels – like renewable propane – all have to factor in the equation of how to combat one of the most critical issues of our time.

The Western Propane Gas Association appreciates your work on the proposed Investment Plan and hope the Commission and staff take a more holistic view of the complementary role propane and renewable propane play alongside decarbonization efforts including solar, wind and other renewable fuels.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Granholm", written in a cursive style.

Ben Granholm  
Regulatory Affairs Specialist