

**DOCKETED**

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**on FY 2021-2022 Investment Plan Update for the Clean  
Transportation Program**

*Additional submitted attachment is included below.*



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September 30, 2021

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE: FY 2021-2022 California Energy Commission (CEC) Investment Plan Update for the Clean Transportation Program

Dear CEC Staff,

Clean Cold Power (CCP) appreciates the opportunity to provide input on CEC's proposed FY 2021-22 Clean Transportation Program Funding Plan and supports the proposed investments in medium- and heavy-duty ZEV infrastructure.

CCP is deploying cost-effective, safe, and easy to install zero-emission transportation refrigeration units (TRUs). Our nitrogen-based cooling system provides efficient cooling in the transport of food, medicine, and other goods, which provides a cleaner and more sustainable alternative to conventional diesel refrigeration units. Our TRUs are powered by sustainable nitrogen, from air – without combustion, fuel or the extraordinary pollution generated by conventional diesel-powered refrigeration. Every CCP TRU that replaces a diesel one has the same benefit to clean air as taking 80 cars off the road. In addition, CCP's TRUs are much quieter, reach cold temperatures much faster, and have more precise cooling control than conventional systems.

CCP strongly supports the proposed recommended allocation of \$373 million for zero-emission medium- and heavy-duty infrastructure. **Within this proposed allocation, CCP respectfully requests including eligibility for zero-emission cooling technology infrastructure, such as liquid nitrogen powered cooling for the transport of good and medicine in TRUs.** CCP's nitrogen cooling system is listed on the California Air Resources Board Zero-Emission TRU technologies, as it is not powered by an internal combustion engine in any way.

TRUs emit multiple air pollutants, such as diesel PM, fine particulate matter (PM<sub>2.5</sub>), oxides of nitrogen (NO<sub>x</sub>), and greenhouse gases (including hydrofluorocarbons and black carbon).<sup>1</sup> TRUs typically operate at refrigerated warehouses or distribution centers (which include cold storage warehouses), grocery stores, seaport facilities, intermodal railyards, and other locations that are often near sensitive receptors, such as schools, hospitals, senior care facilities, and residential neighborhoods.<sup>1</sup> Emissions from diesel-powered TRUs contribute to community health risk, regional air pollution, and global climate change.<sup>1</sup>

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<sup>1</sup> California Air Resources Board, Public Hearing to Consider the Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled TRU and TRU Generator Sets, and Facilities Where TRUs Operate, Initial Statement of Reasons, 7/27/2021.

Including eligibility for zero-emission cooling technology within the zero-emission medium- and heavy-duty infrastructure funding allocation will help significantly displace conventional diesel fueled cooling systems, which emit concentrated levels of particulate matter, most often in the most disadvantaged communities and highly populated areas.

CCP appreciates the opportunity to provide input on and support for the FY 2021-22 Funding Plan for Clean Transportation Funding Program. We thank staff for the focus on medium and heavy-duty infrastructure incentives and look forward to working with the CEC as the funding plan is implemented.

Sincerely,

A handwritten signature in blue ink that reads "Tom Keller".

Tom Keller  
CEO  
Clean Cold Power