



Union of
Concerned
Scientists

Citizens and Scientists for Environmental Solutions

September 8, 2009

Commissioner Jeffrey D. Byron
California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

09-IEP-1K

DATE 9/8/2009

RECD. 9/9/2009

Re: Docket No. **09-IEP-1K**: 2009 IEPR – Transportation Energy Forecasts

Dear Commissioner Byron:

The undersigned organizations appreciate the efforts of the California Energy Commission (CEC) to promote a vision for a low carbon transportation future and the CEC staff's efforts to engage the public in the development of the 2009 Integrated Energy Policy Report (IEPR).

While we acknowledge that the IEPR - Transportation Energy Forecasts report:

- 1) predicts that total annual gasoline consumption in California could fall by more than 33 percent by 2030 due to high fuel prices, efficiency gains and competing fuel technologies, and,
- 2) notes that emerging fuels can potentially displace significant amounts of petroleum, which can reduce the need for petroleum-specific infrastructure enhancements,

we are concerned that the report focuses heavily on infrastructure needs to expand development and access to carbon-intense fuels such as petroleum, and the development of liquid biofuels to meet California's transportation needs, rather than the deployment of a broader portfolio of fuels, including electricity, hydrogen and other low-carbon sources. We believe that the 2009 IEPR should provide stronger support for a cleaner transportation future in the following ways:

- ***Emphasize the importance of reducing petroleum dependence and promote state goals to increase sustainable alternative transportation fuels as a key strategy for meeting California's greenhouse gas reduction goals.*** Several concepts presented throughout the Transportation Energy Forecasts report focus on the barriers (infrastructure, consumer unfamiliarity, etc) to greater deployment of electric and hydrogen vehicles, rather than stressing the urgency of integrating these new technologies (supported by the AB32 Scoping Plan, AB118 program, AB1007 State Alternative Fuels Plan) and other strategies to reduce our dependency on high carbon fuel sources with extreme climate change, air

quality and public health impacts. We feel it is important to integrate and expand upon the CEC staff analyses conducted in support of AB1007 and the AB118 Investment Plan, and to extensively explore the policy implications of this work in the Transportation Energy Forecasts and Analyses Report.

- ***Be consistent with the California Energy Commission's "2050 Vision Statement"*** as outlined in the 2007 Alternative Fuels Plan which concluded that to meet California's 2050 goal of reducing greenhouse gases by 80 percent, a majority of transportation fuels should be no carbon or ultra low carbon by 2050. In order to reduce our petroleum dependence from 96 percent today to 30 percent by 2050, the IEPR must provide support for the rapid integration of the cleanest fuels, including hydrogen and electric technology, sustainably produced advanced biofuels and clean mass transit, into the fleet mix.
- ***Clearly support the goals of the California Air Resources Board's Zero-Emission Vehicle program and the recently adopted Low Carbon Fuel Standard.*** Strategies discussed at the workshop to increase domestic oil production (oil sands and shale, offshore drilling, etc.) do not mesh with the need and requirements for cleaner vehicles and fuels in California. The IEPR should support, and not work at cross purposes of, the implementation of regulations for reduced carbon intensity transportation fuels and increased deployment of zero-emission vehicles and infrastructure in California. The IEPR should also focus on ways to cost-effectively and successfully overcome challenges faced by clean, low carbon fuels in order to ramp up their production and use.

We thank you again for an open process for developing the IEPR and look forward to working with the Commission to ensure a diverse energy future that reduces greenhouse gases and improves California's air quality and public health.

Sincerely,

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American Lung Association in California

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