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*Comment Received From: Coltura*  
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**Urging Energy Commission to publish city-level annual gasoline sales volumes**

Please see attached.

*Additional submitted attachment is included below.*

7/15/20

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Submitted electronically

Subject: Comments on Draft Scoping Plan for the 2020 Integrated Energy Policy Report, Docket No. 20-IEPR-01

Dear Commissioner Monahan,

Thank you for the opportunity to comment on the Scoping Plan for the 2020 IEPR Update.

Coltura is a nonprofit working to accelerate the transition from gasoline to cleaner alternatives. Our vision is a gasoline-free America by 2040. In California we are pursuing state and local policies focused on reducing gasoline consumption.

To that end, we urge the Energy Commission to publish annual gasoline sales volumes at the city level and should comply with its legal obligation to enforce the requirement for every gas station to submit an annual gasoline sales volume report.

On July 14, 2020, the city of Menlo Park adopted a [climate action plan](#) with a goal to reduce gallons of gasoline sold at retail fueling stations within the city by 10% a year from a 2018 baseline. Other cities are likely to follow suit as it becomes clear that drastic reduction in gasoline sales are critical to meet climate goals.

How can Menlo Park and other cities measure gasoline sales from gas stations within city limits? The Energy Commission has this data. California gas stations are required to submit a [report](#) annually to the Energy Commission stating how many gallons of gas they sold in the prior year. However, so far the Energy Commission has not published the data at the city level.

Moreover, the Energy Commission has not complied with its [legal mandate](#) to impose penalties of \$500-\$2,000 a day on gas stations which fail to report. As a result, the CEC admits that total sales volumes were [under-reported by 10% to 30%](#) over each of the last ten years.

Cities need an accurate count of annual gallons of gasoline are pumped within their borders, so they can set and publicize gasoline sales reduction goals, assess the impact of transportation greenhouse gas reduction measures and refine strategies to more effectively reduce gasoline consumption.

Cities are well-positioned to drive their residents' gasoline use lower by taking accountability for reducing the gasoline pumped within their borders. They can:

- set an annual reduction target for gallons of gasoline pumped within their borders;
- publicize their gasoline reduction targets; engage city residents in achieving the targets; spark competition with neighboring cities;

- assess programs and incentives (such as EV charging infrastructure, transit, subsidies for e-bikes and e-scooters, EV ride & drives, and education campaigns) by their impact on the targets;
- track and report progress toward the targets; and
- celebrate as milestones are achieved.

The Energy Commission's motto, stated on the homepage of its website, is "Leading the State to a Clean Energy Future." A clean energy future includes drastic reductions in gasoline use. To set goals around and track progress toward these reductions, cities need accurate city-level annual gasoline sales volume data. The Energy Commission should take the necessary steps to provide that data.

We appreciate the Energy Commission's IEPR process as an opportunity to bring to light a simple step the Commissions could take to enable California cities to take accountability for reducing gasoline use. We look forward to your continued leadership.

Sincerely,

          /s/ Janelle London          

Janelle London  
Co Executive Director, Coltura  
[www.coltura.org](http://www.coltura.org)

Please note that Coltura is seeking access to the city-level gasoline sales volume data via Public Records Act request, and this comment in no way diminishes its intent to pursue that request to the fullest extent of the law.