Docket Optical System - Fwd: DaimlerChrysler comments on AB 1007 Workshop

From: Mike McCormack
To: Docket Optical System
Date: 6/8/2007 3:29 PM
Subject: Fwd: DaimlerChrysler comments on AB 1007 Workshop
CC: docket@energy.state.ca.us; Peter Ward; Tim Olson

FOR SUBMISSION TO DOCKET #06-AFP-1

Mike McCormack
Emerging Fuels and Technology Office

>>> <lkb@daimlerchrysler.com> 6/8/2007 1:57 PM >>>

Mike,

With respect to the ethanol presentations at the joint CEC/CARB workshop, DaimlerChrysler has two comments:

1. One scenario considers the use of 15% ethanol in conventional gasoline. We would not recommend the use of ethanol/gasoline blends higher than 10% in any vehicles other than FFVs without a thorough study of the emissions, vehicle durability, and customer satisfaction impacts of such fuels. Conventional vehicles have only been validated on ethanol blends up to 10%. Higher levels of ethanol are likely to lead to higher exhaust gas temperatures, particularly under high speed and load conditions. High exhaust gas temperatures can lead to exhaust valve and catalyst deterioration. Most fuel system components have not been tested with E10+ blends. Corrosion of metal parts and degradation of plastic and elastomeric parts is a very real possibility. Emissions from conventional vehicles running on E10+ fuels are an unknown quantity, and could lead to air quality problems.
2. While we are working very hard both internally and with the Air Resources Board to certify more flexible fueled vehicles for the California market, the emissions standards, particularly for evaporative emissions at the PZEV level are particularly challenging. Some accommodations by the Air Resources Board on the evaporative emissions test for FFVs might make your 50% scenario more achievable. In conjunction with our deployment of FFVs, the state can play a big role in spurring the development of an E85 distribution system.

Likewise, we have two comments with regard to the staff presentation on renewable diesel:

1. While renewable diesel displaces petroleum and reduces GHG emissions by direct replacement, it can replace additional petroleum usage and further reduce GHGs in the light duty fleet, in particular, due to the greater fuel efficiency of the diesel engine. Light duty diesel engines which can be certified to California emissions standards will probably be in the market before the end of this decade.
2. For renewable diesel fuels to be successful, there must be robust quality standards in place. For instance, while B20 (20% biodiesel in conventional diesel fuel) is currently qualified as an alternative fuel under the federal EPACT rules, there is no national standard assuring the quality of this fuel. California stakeholders should join with stakeholders nationwide in developing standards for B20 and other alternative fuels.

While our remarks are brief, we appreciate the opportunity to comment, and look forward to working with the Energy Commission and the Air Resources Board on this important and timely issue

Loren Beard

Loren K. Beard, PhD
Senior Manager - Energy Programs
Environmental and Energy Planning
CIMS 482-00-71
DaimlerChrysler Corporation
800 Chrysler Drive
Auburn Hills, MI 48326
E-Mail: LKB@DCX.com
Phone: (248) 576-7466
FAX: (248) 576-7928