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October 5, 2007

California Energy Commission
Docket Office, MS-4
Re: Docket 06-AFP-1, Alternative Fuels Transportation Plan
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET 06-AFP-1	
DATE	OCT 0 5 2007
RECD.	OCT 1 1 2007

To Whom It May Concern:

On behalf of the propane industry in California, I would like to express my appreciation to the California Energy Commission and the California Air Resources Board for its work to increase the use of alternative transportation fuel as directed by AB 1007.

We respectfully submit the following three comments regarding the Alternative Fuels Transportation Plan, Docket 06-AFP-1:

1. The report notes that interest in propane as an on-road fuel has waned in recent years. We anticipate that the introduction of two new major OEM investments – a Blue Bird school bus and a Roush/Ford F-150 truck – as well as ongoing investments in infrastructure will increase propane's market share in the alternative fuel arena. The Western Propane Gas Association, working in conjunction with national efforts being coordinated by the Propane Education & Research Council (PERC) and the National Propane Gas Association (NPGA), is actively promoting these two OEM projects as well as additional CARB-certified propane engines. In the coming years, PERC anticipates investing millions of dollars into the development of additional on- and off-road engines for all sectors of the market.
2. It is extremely important that we stimulate the retrofit market for propane vehicles. I would refer you to a comment submitted on June 5 by IMPCO Technologies, Inc., regarding current impediments they face in bringing retrofits to the California market. Our association receives multiple inquiries every week from consumers who would like to retrofit their vehicles, but at this point, is it not an option. If the California Air Resources Board and California Energy Commission could work with the retrofit manufacturers to ensure quality products without burdensome regulations which increase the cost of the product, we feel propane could reach even more users in a cost-effective fashion.
3. One of the items listed in the "Propane Actions" section (page 16 of the report) suggests a need to "Facilitate/resolve volatile organic compound emissions from refueling systems..." The propane industry is taking steps to aggressively improve its equipment, thereby significantly reducing the emissions from delivery operations. The Western Propane Gas Association funds a project to promote the purchase and installation of this low-emission equipment.

In addition, the Propane Education & Research Council and the National Propane Gas Association are considering changing the nationally-recognized Certified Employee Training Program (CETP) to retrain operators in the use of the outage valve to reduce emissions. In California, CETP courses already include this instruction. New devices recently entered into the marketplace reduced emissions from the outage valve by approximately 70 percent.

Western Propane Gas Association Comments, Page Two
Docket 06-AFP-1, Alternative Fuels Transportation Plan
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Again, California's propane industry is grateful for the opportunity to be included in the Alternative Fuels Transportation Plan. Our industry has been extremely impressed by the professionalism and dedication exhibited over the past year by the CEC and ARB staff members assigned to the propane research. We look forward to continuing our work with both agencies for many years to come with propane as part of the state's long-term solution to making transportation cleaner.

Sincerely,

A handwritten signature in black ink, appearing to read "Lesley Brown Garland". The signature is written in a cursive style with a large initial "L" and "G".

Lesley Brown Garland
President and CEO