

From: Richard Lyon
To: California Energy Commission
Subject: AB 118 Docket No. 08-ALT-1

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DATE	DEC 05 2008
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**Request for Changes
Sustainability Working Group Meeting
December 5, 2008**

Thank You again for inviting me to the Sustainability Working Group meeting on December 5th. Pursuant to your directive to the participants at the meeting, I have provided suggested revisions to the "California Energy Commission Staff Working Draft Discussion Paper" dated December 5, 2008. Please let me know your thoughts and if you support the requested changes. If you do support the changes, I will be more than happy to provide the key Questions and Thresholds to support these changes. I would like to take this opportunity to also Thank **Danielle Fugere** from Friends of the Earth for her comments about bringing the "Vehicle Technology" back into the Investment Plan and funding categories for a holistic solution for air pollution and GHGs. Per the first sentence in Assembly Bill No. 118: "Alternative fuels and vehicle technologies: funding programs".

Request Changes in **blue (strike and add)**.

Page 1 please **add**: Sustainability Elements The funding categories presented in the Investment Plan will guide the Energy Commission's investment towards fuels and **vehicle** technologies that are most sustainable in the broadest sense; funding those fuels and **vehicle** technologies with the greatest potential.....

Page2 paragraph 1 please **add**: The sustainability goals reflect the Energy Commission's long-term objectives for sustainability production of alternative fuels and **innovative and pioneering vehicle technologies**. Paragraph 6: Staff's goal is to create an incentive system that encourages the most innovative and sustainable alternative fuel production practices and **innovative and pioneering vehicle technologies**.

Page 6 paragraph 1 (sec. d) please **add**: Towards that end, the commission or its assigned policy committee shall identify, support and give preference to those fuels and **innovative vehicle** technology options with the best.....

Page 6 please **add paragraph 3 sec. (1)**: Recognize, support and incentivize innovative and **pioneering vehicle technologies** that can demonstrate a low impact to the existing civil structure during deployment, can be used to replace existing polluting and GHG emitting vehicles (Enhanced Fleet Modernization Program), is commercially viable, has extendability for use throughout California and has the potential to be the transportation of choice.

Page 6 paragraph 4 sec. (f) please **add**: the third sustainability goal shall be to support verifiable sustained production of alternative and renewable fuels and **innovative vehicle technologies**.

Page 6 paragraph 5 insert between sec. (1 & 2): Identify, promote and collaborate in the manufacturing and deployment of **innovative and pioneering vehicle and guideway technologies throughout California and domestic markets**.

Page 6 paragraph 5 sec. (1) please **add**: "while providing economic benefits to the **domestic** areas in which production occurs.

Page 6 paragraph 5 sec (1) please **strike**: "support sustainable domestic and international production of alternative and renewable fuels for California.

Page 7 under Non-Regulatory Definition of "Sustainability" please add: **(4) Technologies and products shall be commercially viable and well received in the market place, such that sustained reductions of GHG emissions attributed to transportation will achieve 1990 levels by 2020. (5) Technologies and products will have a demonstrated positive impact economically by creating a knowledgeable and sustaining workforce in California.**

Page 8 paragraph 3 please add: The Energy Commission will give high preference to projects with the greatest potential to substantially **and progressively** reduce transportation-related greenhouse gas emissions

Page 8 paragraph 4 please add: The Energy Commission can promote projects that minimize environmental impacts and the use of natural resources by recognizing projects that maximize the use of waste stream materials as their feedstock. **The Energy Commission will give high preference to projects and products that use zero emission energy sources in the manufacturing and operation of the product.**

Page 10 paragraph 3 please add: **(Characteristic 12): The Energy Commission can further sustainability goals by recognizing projects that reduce the total environmental load by reducing or using existing distribution systems.**

Best regards,

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