

## Docket Optical System - Follow-up Submission under AB 118 from FPC Worldwide LLC

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**From:** "Steve Trattner" <steve@fpcworldwide.com>  
**To:** <jboyd@energy.state.ca.us>, <kdouglas@energy.state.ca.us>  
**Date:** 4/19/2009 2:37 PM  
**Subject:** Follow-up Submission under AB 118 from FPC Worldwide LLC  
**CC:** <dschwyze@energy.state.ca.us>, <kbirkins@energy.state.ca.us>, <sbrown@energy.state.ca.us>, <docket@energy.state.ca.us>, <shep@fpcworldwide.com>

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Dear Commissioners Mr. Boyd and Mrs. Douglas:

We are writing as a follow up to our recent submission on April 3, 2009 to the AB 118 docket for our diesel fuel additive FPC. As we pointed out in that letter FPC has already been tested numerous times using the most scientific methods by independent labs and universities and shown to significantly reduce greenhouse gases and other harmful emissions and reduce fuel consumption on average by 4-8%. Indeed as we explained this is why the climate control advisors to Australia recommended that all users of diesel begin to use FPC.

The purpose of this follow-up letter is (1) to add a further submission in the context of your hearing on April 6 and your draft Investment Plan, and (2) to clarify our April 3 submission. With respect to adding a further submission, it is our understanding that at this time you have not allocated any funding for testing and verification of new alternative fuels, fuel additives and other aftermarket products. We appreciate that your decision may be based in part on the view that all such products will not be worth testing or verifying because most if not all of the ones you and your staff are familiar with do not work. However, we suggest that where, as here in the case of FPC, a company has come forward with substantial scientific testing by third parties that establish the basis for claims like ours that it would be prudent to allocate money for them since they would provide **immediate** assistance in helping California meet its targeted goals of emissions reduction.

In terms of clarifying our submission, we are simply asking you to do what was recently published by Australia which is to use FPC to reduce the greenhouse gases and harmful emissions caused by your use of diesel fuel. To that end, we stated in our submission that you may want to consider testing if necessary. However, we want to point out that even if you want to do a test to verify our claims we can supply you the FPC at no charge for your testing and you can use your own State emission centers to use the EPA carbon mass balance test to verify our claims. In short, no funds are necessary for you to allocate to test or verify the claims we have made for FPC and thus we urge you to go forward on that basis so that you can reduce your carbon foot print by 4-8% and then later allow other consumers of diesel fuel in California to do the same.

I would welcome any questions that you have and look forward to a favorable reply.

Stephen Trattner  
 President  
 410-280-6001

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