



California Natural Gas Vehicle Coalition

DOCKET

10-ALT-1

DATE JUN 06 2011

RECD. JUN 06 2011

June 6, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 10-ALT-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 2011-2012 Investment Plan Committee Draft – Docket 10-ALT-1

Dear Investment Plan Team:

The California Natural Gas Vehicle Coalition submits the following comments on the Committee Draft of the 2011-2012 AB 118 Investment Plan. We greatly appreciate the significant support for natural gas transportation reflected in the Committee Draft. We also appreciate the time and effort the Energy Commission staff and Commissioners have put into this Plan.

The California Natural Gas Vehicle Coalition represents the state's natural gas vehicle industry and includes major automobile manufacturers, utilities, heavy-duty engine manufacturers, fueling station providers, equipment manufacturers, and fleet users of natural gas vehicles.

We submitted comments dated March 25th on the staff draft report. This comment letter addresses our primary concern with the Committee Draft which is the apparent exclusion of landfill biomethane projects. We also provide some suggestions for improving the Plan's presentation and note some specific errors.

Biomethane funding should include landfill projects

The California Natural Gas Vehicle Coalition strongly supports the continued development and greater use of renewable natural gas (RNG) also known as biomethane. As we noted at the last Advisory Group meeting the current draft of the plan seems to limit future biomethane investments to pre-landfill projects. We say "seems to" because "pre-landfill" is noted in some sections of the draft but not all. We support a general focus on pre-landfill waste materials but continue to believe that CEC should maintain the flexibility to fund good landfill RNG projects.

Other suggestions and corrections

We recommend updating the data used in Figure 2 on page 61 to reflect prices through the first quarter of 2011 just as you have done in Figure 3.

On page 69 the draft plan reports that the incremental cost of the NGV Civic GX is \$9,600 compared to the gasoline equivalent vehicle. The incremental cost is actually \$6,900.

On the bottom of page 120 there is a discussion of a Program Opportunity Notice for natural gas vehicle funding. It appears this section needs updating to reflect that this PON was released earlier this spring.

We respectfully request you modify the draft to address the issues we raise in these comments.

Sincerely,

A handwritten signature in black ink that reads "Tim Carmichael". The signature is written in a cursive, flowing style.

Tim Carmichael
President

CC: Commissioner Boyd
 Commissioner Peterman
 Pat Perez
 Charles Smith