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California Energy Commission
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Comments of Sterling Rose Transportation regarding the California Energy Commission's Draft 2013-2014 Investment Plan for the Alternative and Renewable Fuel and Vehicle Technology Program

Sterling Rose Transportation would like to thank the California Energy Commission (Energy Commission) for the opportunity to provide these public comments regarding the Alternative and Renewable Fuel and Vehicle Technology Program Buy-down Incentives for Natural Gas and Propane Vehicles (Program). Sterling Rose Transportation has experienced several challenges to participating in this Program including:

Knowledge of the Program: Many small and medium size fleet customers are unaware that the Energy Commission has incentives available for natural gas and propane vehicles via the Buy-down program.

Visibility of Available Funding and Vehicles: There is no mechanism to communicate how much funding is available in "real-time". Further, to identify participating dealerships fleets must either contact the OEMs directly or read through funding award announcements on the Energy Commission's website. Both methods create an inefficient and time consuming process, which in turn is a significant barrier to participating in the program.

Dealer/OEM Focused Model: The way incentives are allocated places the responsibility for securing funding on participating OEM's and/or designated dealerships. Interested smaller dealerships in lower volume less urban areas are unlikely to be identified for participation. End users seeking alternative fuel vehicle incentives under the Program are faced with limited funding availability that may not be convenient or economically feasible for them to access.

In summary, Sterling Rose Transportation believes there are significant challenges that exist with accessing Buy-down Incentives for Natural Gas and Propane Vehicles. The Program should be revised to enhance and encourage the adoption of gaseous fuel vehicles in small to medium-sized fleets.

We are gratified to have the opportunity to engage with the Energy Commission on these important endeavors, which are critically important for California's transition to a clean energy economy.

Sincerely,

Steven Levin
 Sterling Rose Transportation
 President