

October 31, 2013

Stephanie Bailey
California Energy Commission
By Email: Stephanie.Bailey@energy.ca.gov

RE: Comments for Draft 2013 Integrated Energy Policy Report (IEPR)

California Energy Commission

DOCKETED

13-IEP-1A

TN 72314

OCT 31 2013

Dear Ms. Bailey,

Thank you for the opportunity to submit comments on the Draft 2013 Integrated Energy Policy Report (IEPR). We have reviewed Chapter 8: Transportation Energy, and offer the following remarks.

By way of background, the Diesel Technology Forum comprises diesel engine, vehicle and equipment manufacturers and serves as an advocate for clean diesel technologies by educating policy makers and the public about the unique environmental attributes and economic contributions of the clean diesel system.

IEPR Comments

The following sentence that appears on page 179 may be a remnant from previous IEPRs and may not be consistent with existing California Energy Commission (CEC) programs.

“Accelerate shifts in medium and heavy duty truck fleets from diesel to natural gas to capture early carbon reduction benefits and begin investments in ZEV truck technologies to meet long-term carbon and criteria emissions reduction goals.”

This passage does not recognize the tremendous improvements that have been made in recent years in criteria pollutant emissions reductions from diesel engines and aftertreatment technologies. Advancements in bio-based diesel fuels also enable significant tailpipe carbon reduction from existing diesel fleets and are also not reflected in this language.

\$26 million¹ has been allocated to date in the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) for the production of diesel fuel substitutes. Also on page 179, language calls for additional funding for other biofuel related feasibility studies. Funding for bio-based diesel fuel substitutes may be counterproductive if the CEC's ultimate goal is to shift the state's heavy-duty vehicle fleet away from diesel engines and fuel.

Nationwide, natural gas is not expected to comprise more than 10% of the medium and heavy duty (Class 3-8) market in the coming years. Diesel will remain the predominant powertrain in this market including California. We hope that the CEC recognizes advanced diesel technologies coming to the market soon that will help meet California's GHG emissions goals including diesel-electric and hydraulic hybrid technologies.

¹ Draft 2013 IEPR, P. 175, Table 13: Detailed Accounting of ARFVTP Award Categories through June 30, 2013

The Draft IEPR also does not address fuel economy improvements and energy demand reduction from the anticipated growth in California's light duty diesel fleet as outlined on page 182:

"By 2014, up to 20 new diesel models of passenger vehicles and light trucks should be available in North America, possibly accelerating a transition to diesel fuel from gasoline and providing another market for biodiesel and renewable diesel."

We agree that the number of light duty cars and trucks on California's roads will increase in the short term. Baseline estimates place the light duty diesel car and truck fleet at about 7% of the light duty market by 2020 nationwide. The light duty diesel fleet typically achieves a 20% to 40% increase in fuel economy compared to a comparable gasoline powered vehicle as well as a 10% to 20% reduction in emissions. We hope that you recognize that the consistent growth in the light duty diesel market will have real benefits to California in terms of fuel savings and emission reduction.

Conclusion

We thank you for the opportunity to provide comments to the Draft IEPR and we hope that you will recognize the contribution of diesel technologies to the continued emission reduction and future fuel savings.

Very truly yours,

A handwritten signature in black ink, reading "Allen R. Schaeffer". The signature is fluid and cursive, with the first name "Allen" and last name "Schaeffer" clearly legible.

Allen Schaeffer
Executive Director
Diesel Technology Forum