Shyam Nagrani, VP Marketing, Motiv Power Systems, Foster City, CA 94404

shyam@motivps.com; 650-704-2578

## docket number "13-ALT-02" for "2014-2015 Investment Plan Update"

Major proposed funding allocations are listed below. The plan itself provides more detail on CEC's thinking, but stakeholders are encouraged to weigh in with thoughts on how best to target this money.

- Biofuels production (\$20 million)
- Hydrogen infrastructure (\$20 million)
- Medium and heavy duty vehicle demos (\$15 million)
- EV charging infrastructure (\$15 million)
- NGV incentives (\$9 million)
- Manufacturing (\$5 million)

## DOCKETED 13-ALT-02

TN 72341

NOV. 14 2013

## **Comments:**

The ARB is tasked with monitoring and reducing GHG emissions by 25 percent by 2020 and achieving 80 percent more in reductions by 2050. AB 32, the Global Warming Solutions Act of 2006, established the mandate to reduce GHG emissions in California to 1990 levels by 2020 using a portfolio of strategies, with strong emphasis on increased energy efficiency and the use of renewable energy. The ARB's Climate Change Scoping Plan, released in 2008, is the state's roadmap to reach the GHG reduction goals required by AB 32.

There are several easily recognized trends that indicate a focus on medium duty trucks and buses is a valuable investment for the future. The California CEC 2010 report (California Energy Commission, 2011. 2010 Integrated Energy Policy Report Update. Publication Number: CEC-100-2010-001-CMF) shows that electrification of transportation will be the single most impactful change to tackle the GHG challenge.

Presently in California 95% of the population lives in an urban area. We can already see the accelerating growth curve for transport and delivery vehicles over that for private automobiles. 79.6% of vehicles in California are trucks. Over a third of these vehicles (medium duty delivery vans, shuttle buses) are prime candidates for ZEVs. In the above allocation of money, there is no money earmarked for ZEVs. \$15M is allocated for EV charging infrastructure which is generally used by passenger cars. Considering the mileage driven by trucks the GHG impact of one ZEV truck is about the same as 5 passenger cars. To make the maximum impact on GHG emissions making trucks ZEVs would be the most efficient.

By that reasoning at least 2 times that should be allocated to ZEVs or \$30M. That should be rectified if we are serious about these huge GHG emissions reductions.