



February 7, 2014

California Energy Commission
Fuels and Transportation Division
Attn: Natural Gas Vehicle Incentives PON-13-610
1516 Ninth Street, MS-44
Sacramento, CA 95814

Re: Alternative and Renewable Fuel and Vehicle Technology Program, Natural Gas Vehicle Incentives PON-13-610

Dear California Energy Commission,

We want to start by thanking the CEC for this program and to let you know we appreciate it greatly. On Thursday we listened in on the workshop and wanted to send in a suggestion on the buy down incentive amounts and the classes. We would like to suggest amounts in the table listed in the PON from the data and research we have done in past years. The data shows the quantities of vehicles that make up the majority of the target vehicles the CEC wants to cover such as light, medium, and heavy duty vehicles. .

We have data from 1984 to 2009 of new light, medium and heavy duty vehicles registered with the DMV in the USA in Classes 4,5,6 and 7. The market share from years 1984 to 2009, in these classes specifically classes 4,5,6 belonged to the vehicles that were produced and sold under brand names Isuzu, GMC, and Chevrolet. To give you an example Isuzu had 80% of the forward cabin truck market in the USA compared to others such as Mitsubishi and Hino.

Please see below data we obtained from RL POLK with new vehicles registered with DMV's all across the USA under these brands and classes. Table 1 shows the quantities registered from 1984 to 2009 which is 25 years of information. Table 2 shows all brands and current quantities sold as listed in Truck Fleet last year 2013. These tables and graphs provide us an idea of what has been sold and registered in the USA.

The Data generated from registrations were based on the following factors:

Years 1984 to 2009
Classes 4,5,6, and 7
Brands: Isuzu, GMC, Chevrolet
All types of fuels
All types of engines
All types of cabins



All Types of Vocations such as the list below:

BEVERAGE PROCESSING & DISTRIBUTION
CONSTRUCTION
DEALER
EMERGENCY VEHICLES
FOOD PROCESSING & DISTRIBUTION
FORESTRY/LUMBER PRODUCTS
GENERAL FREIGHT
GENERAL FREIGHT/HAZARDOUS MATERIALS
GOVERNMENT/MISCELLANEOUS
HAZARDOUS MATERIALS
INDIVIDUAL
LANDSCAPING/HORTICULTURE
LEASE/FINANCE
LEASE/MANUFACTURER SPONSORED
LEASE/RENTAL
MANUFACTURING
MINING/QUARRING
MISCELLANEOUS
MOVING AND STORAGE
ROAD/HIGHWAY MAINTENANCE
SANITATION/HAZARDOUS MATERIAL
SANITATION/REFUSE
SERVICES
SPECIALIZED/HEAVY HAULING
UTILITY SERVICES
VEHICLE TRANSPORTER
WHOLESALE/RETAIL

Table 1

**LIGHT, MEDIUM, & HEAVY DUTY TRUCKS REGISTERED IN USA
BRANDS: ISUZU, GMC, CHEVROLET
YEARS 1984 TO 2009**

CLASSES	QUANTITY
CLASS 4 (14,001 TO 16,000) & CLASS 5 (16,001 TO 19,500)	177,925
CLASS 6 (19,501 TO 26,000)	16,629
CLASS 7 (26,001 TO 33,000)	5,019

**1984 TO 2009 LIGHT, MEDIUM, AND HEAVY DUTY TRUCKS
REGISTERED WITH DMV IN THE USA UNDER BRANDS ISUZU,
GMC, CHEVROLET**

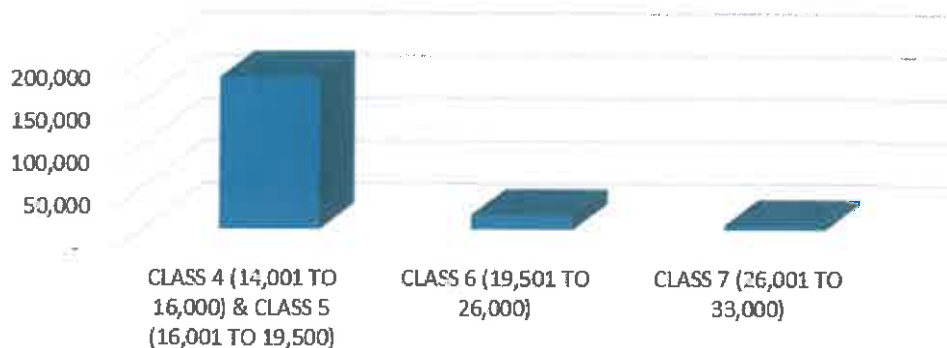


Table 2

LIGHT, MEDIUM, & HEAVY DUTY TRUCKS SOLD IN USA
YEARS 2013

CLASSES	QUANTITY
CLASS 4 (14,001 TO 16,000) & CLASS 5 (16,001 TO 19,500)	71,954
CLASS 6 (19,501 TO 26,000)	47,475
CLASS 7 (26,001 TO 33,000)	47,524

2013 LIGHT, MEDIUM, AND HEAVY DUTY TRUCKS SOLD IN THE USA



From the data we can see classes 4,5,and 6 have the largest quantities. Therefore we suggest that that the incentive amounts be adjusted.



Current Table of Incentives

Natural Gas Vehicle Incentives

GVW (lbs)	Incentive Amount
Up to 8,500	\$1,000
8,501 – 16,000	\$6,000
16,001 – 26,000	\$11,000
26,001 – 33,000	\$20,000
33,001 & greater	\$25,000

Suggested Table of Incentives

Natural Gas Vehicle Incentives

GVW (lbs)	Incentive Amount
Up to 8,500	\$2,000
8,501 – 14,000	\$11,000
14,001 - 16,000	\$20,000
16,001 – 26,000	\$25,000
26,001 – 33,000	\$25,000
33,001 & greater	\$35,000

In conclusion we would like to suggest these incentives so they are more aligned with the number of vehicles sold in the weight classes CEC is interested in providing incentives on.

Also we would like to suggest that a separate incentive table be created for new conversions of natural gas vehicles. The new conversions are done before a customer takes delivery and registers the vehicles at DMV. The conversion incentives we would like to suggest would be the same as the incentives suggested above.

If you have any questions please contact us.

Sincerely,

Sosi Bardakjian
Greenkraft, Inc.