



WASTE MANAGEMENT

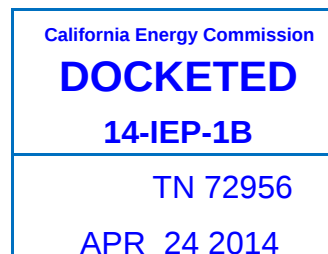
Public Affairs

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April 24, 2014

California Energy Commission
Dockets Office, MS-4
1561 Ninth Street
Sacramento, CA 95814-5512

Via Email: docket@energy.ca.gov



RE: Transportation Technology over the Next 10 Years, Docket No. 14-IEP-1B

Dear California Energy Commission:

Waste Management (WM) is submitting comments in response to the recent California Energy Commission (CEC) workshop held on April 10, 2014: *The State of Alternative Transportation Technologies over the Next 10 Years*. WM strongly supports the use of natural gas as a transportation fuel for it not only offers reductions in fuel costs, but it also provides significant environmental benefits to the state by reducing greenhouse gas emissions and other pollutants harmful to public health. WM also supports developing the necessary fueling infrastructure to maximize natural gas use in vehicles and equipment. Developing a network of natural gas fueling stations is a critical step towards greater adoption of natural gas-fueled vehicles, especially in the heavy-duty vehicle sector.

WM has extensive experience operating and maintaining natural gas vehicles. We have been using natural gas vehicles in our fleet for 20 years. Currently, nationwide we have over 3100 heavy-duty natural gas vehicles with over 1200 of those vehicles operating in California. These 1200 vehicles operate in 20 locations throughout the state ranging in individual fleet sizes 11 HD vehicles in Fresno to over 155 HD vehicles in San Diego County.

WM would like to expand our HD natural gas vehicles to 80% of our approximately 19,000 vehicles nationwide and 80% of our approximately 3000 HD vehicles in California. However, this will require support from public agencies, such as the CEC, that will be instrumental in expanding commercialization of near-zero emission natural gas engine technologies.

In spite of the significant capital investments required for vehicles, fueling infrastructure, maintenance infrastructure and personnel training, WM's integration and expansion of natural gas vehicles in its fleet has been successful and beneficial due to the

- competitive price of natural gas,
- cleaner and quieter performing vehicles in the communities we serve,

- grants and tax incentives to offset the additional cost of natural gas trucks and support infrastructure,
- Reduced GHG emissions associated with natural gas vehicles as compared to diesel fueled vehicles, and
- Reduced reliance on fossil fuel by using near zero carbon methane produced from waste materials, including reduced GH emissions associated with natural gas and even further significant reductions associated with waste-based renewable natural gas.

WM is proud of the fact that, in partnership with Linde of North America, we currently operate the worlds largest commercial scale landfill gas to LNG fuel at our Altamont landfill in Alameda County – producing up to 13,000 gallons of low-carbon renewable LNG per day. WM's successful integration of natural gas vehicles has enabled us to produce low carbon renewable natural gas from the wastes we manage. This has further enabled WM to achieve dramatic reductions in greenhouse gas and criteria pollutant emissions in the areas we serve.

It is well known that heavy-duty vehicles are the largest source of NOx pollution in southern California. Continuing to develop and deploy near-zero emission heavy-duty vehicles is essential to help California meet its air quality and climate protection goals. Natural gas is the most affordable, cleanest burning alternative to diesel for heavy-duty vehicle applications. WM strongly supports continued funding from the CEC towards natural gas vehicle technology and infrastructure projects through 2024.

History reveals that economics is a predominant driver for natural gas vehicle adoption, and the CEC should continue providing strategic funding opportunities for near-zero-emission natural gas engine and vehicle technologies. Natural gas-powered vehicles are a proven source of significant emissions reductions.

Continued support of near-zero emission natural gas engine innovation will enable the CEC do its part to help achieve California's goals to reduce petroleum use, improve air quality, reduce carbon emissions, and protect public health.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Chuck White', with a stylized flourish at the end.

Charles A. "Chuck" White, P.E.
Director of Regulatory Affairs, West

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