

April 23, 2014

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

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

Dear California Energy Commission:

CR&R Incorporated (CR&R) 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*. CR&R 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. CR&R 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.

CR&R has extensive experience operating and maintaining natural gas vehicles in the waste and recycling industry. We have been using natural gas vehicles in our fleet for over 12 years. Currently, we have approximately 200 heavy-duty natural gas vehicles that consist of waste and recyclable collection trucks powered by Cummins. Our vehicles operate in Southern California and fuel at one of three of our natural gas fueling stations.

- CR&R would like to expand its natural gas vehicle fleet by an additional 100 trucks by 2016. 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.
- CR&R's integration and expansion of natural gas vehicles in its fleet has been successful because and made possible because of grant monies available to offset the higher capital cost and the need to build fueling infrastructure.

CR&R's successful integration of natural gas vehicles has led to dramatic reductions in greenhouse gas and criteria pollutant emissions in the region.

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. CR&R 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, and 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.

Please feel free to contact us with any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Fahrion', with a stylized flourish at the end.

David E. Fahrion  
President  
Solid Waste Division

cc: Mr. Jim McKinney, Lead Technical Staff  
Mr. Silas Bauer

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