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Mr. Mike Tollstrup
California Air Resources Board
Office of Climate Change
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RE: UPDATED COMMENTS to October 1, 2013, AB 32 Scoping Plan Update Discussion Draft

Dear Mr. Tollstrup,

Southern California Gas Company (SoCalGas) appreciates the opportunity to submit these comments on the AB 32 Scoping Plan Update Discussion Draft (Discussion Draft) prepared by Air Resources Board (ARB) Staff. The current AB 32 Scoping Plan describes strategies and specific measures needed to achieve the greenhouse gas (GHG) reduction goals established by AB32, the Global Warming Solutions Act of 2006. The Discussion Draft, issued on October 1, 2013, is an update to the initial Scoping Plan and focuses on three key questions:

1. How have we done over the past five years?
2. What is needed to continue the prescribed course of action to 2020?
3. What steps must we take in the coming years to continue cutting emissions and growing the economy to meet our long-term climate goals?

SoCalGas' comments focus on Section V—Continuing Progress Beyond 2020—of the Discussion Draft. We are concerned that in the post-2020 period ARB puts forward a very narrow vision focused on one source of energy, electricity, rather than a multi-technology approach. SoCalGas believes that a broader vision is necessary to meet the state's GHG goals and the federal Clean Air Act (CCA) mandated ozone air quality attainment deadlines of 2023 and 2032 for at least two of California's air basins, the South Coast and the San Joaquin Valley.

In these comments, SoCalGas encourages ARB to use technology-neutral performance metrics in order to encourage innovation. We identify (in Appendix A) specific language changes needed to support a multi-technology approach to achieving the state's long-term climate goals. Additionally, we discuss the (1) policy framework for a multi-technology approach, (2) the use of natural gas as a transportation fuel, (3) the stationary source sector, (4) the potential of biomethane, (5) natural gas in the electric generation sector, (6) energy efficient residential and commercial end use applications, and (7) early participation in studies

and rule development pertaining to methane fugitive emissions from natural gas distribution pipelines.

(1) POLICY FRAMEWORK FOR MULTI-TECHNOLOGY APPROACH TO ACHIEVING AIR QUALITY AND GHG REDUCTION GOALS

Mandating a particular type or source of energy will undermine the very technology investments needed to meet short and mid-term air quality goals. SoCalGas believes that technology-neutral, performance-based, outcome-oriented policies should be the basis for the Scoping Plan Update. It is too early and too risky to choose a singular path and a single energy source—electricity—by setting forth a mandate to discontinue use of other forms of energy as the Discussion draft does.

The Discussion Draft Is Inconsistent with Prior ARB Documentation

The *Vision for Clean Air: A Framework for Air Quality and Climate Planning*[1] (Vision) specifically states that the intent is not to identify THE path to meet ozone and 2050 climate goals (*Vision* page 3). In ARB's August 2012 Vision Workshop presentation, this approach is further reinforced (slides 10 and 11) by the statement "What a Scenario is NOT: A policy choice that favors certain technologies and fuels over others."

To be consistent with the approach of the Vision document, the Scoping Plan Update should be open to a multi-technology pathway because it could:

- Reduce criteria pollutant and precursor emissions faster.
- Reduce air toxic emissions faster (faster replacement of diesel trucks and heavy-duty equipment).
- Reduce GHG emissions consistent with a path to reach the State's 2050 goal.
- Provide information to do robust feasibility, cost, upstream/downstream, and infrastructure analyses necessary for future plans and programs that have not been done prior to the Discussion Draft.

Because of the need to achieve multiple major technological, infrastructure, and consumer behavior changes, state policymakers must consider the real possibility that the current Discussion Draft technology pathway, with its predominant reliance on electricity, will likely fail to reach the state's air quality and climate goals. In order to improve chances of successfully reaching the state's 2050 goal, SoCalGas believes a "parallel path" with fewer or a different mix of risks is needed.

The risks ARB faces in following a path that relies heavily on electricity and hydrogen fuel cells in the heavy-duty trucking sector, for example, are:

[1] June 27, 2012 *Vision for Clean Air: A Framework for Air Quality and Climate Planning* prepared by staff of the Air Resources Board, the South Coast Air Quality Management District and the San Joaquin Valley Air Pollution Control District. This joint agency effort takes a coordinated look at strategies needed to meet California's multiple air quality and climate goals well into the future.

- Failing to attain conversion of heavy-duty trucks to electricity at unprecedented rates, with all of the infrastructure and consumer acceptance issues associated with such conversion.
- Failing to attain conversion of heavy-duty trucks using fuel cells due to consumer unfamiliarity with fuel-cell technology and slow development of the required hydrogen infrastructure.
- Stranding alternative technologies already in development and ready for deployment in this decade. For example, the SCAQMD recently awarded a contract to Cummins and Cummins Westport for development of a natural gas heavy duty engine with 90% lower emissions. SCAQMD has characterized this as "power plant equivalent." Investors must make sound business decisions and this promising new heavy duty truck engine will need substantial capital investment from engine manufacturers, as well as significant capital investment for the necessary LNG fueling infrastructure. A state policy to pivot away from natural gas soon after this technology becomes available would have a chilling effect on investors.
- The risk that production of renewable liquid and gas fuels in the quantities envisioned in the Discussion Draft pathways will require many things to succeed simultaneously and, will be very costly.
- Maintaining the competitiveness of California's goods-movement logistics, warehousing, trucking, and shipping industries.
- The challenge of effectively integrating with the national and international freight transportation system.

A Multi-Technology Approach is Consistent with the Efforts of the Legislature and other Agencies

To improve chances of successfully achieving the 2050 GHG goal, as well as the ozone goals, ARB needs a "parallel path," i.e. a multi-technology approach.

California's legislature, Energy Commission (CEC) and Public Utilities Commission (CPUC) have taken great care in not establishing fuel nor technology mandates and instead have established policies to achieve results. When the state legislature looked at utilization of coal resources for electric generation in response to environmental concerns about burning coal, the legislature very thoughtfully established an emission performance metric[2], essentially a carbon-content regime for fuels utilized in electric generation, and the CEC and CPUC set standards and created incentives to utilize the lowest carbon fuels.

SoCalGas recommends that ARB take this kind of long term approach, which is consistent with existing law and CEC and CPUC regulation, as opposed to articulating a mandate against the use of natural gas and other fuels in its Discussion Draft.

[2] On September 29, 2006, Governor Arnold Schwarzenegger signed into law Senate Bill 1368 (Perata, Chapter 598, Statutes of 2006). The law limits long-term investments in baseload generation by the state's utilities to power plants that meet an emissions performance standard (EPS) jointly established by the California Energy Commission and the California Public Utilities Commission.

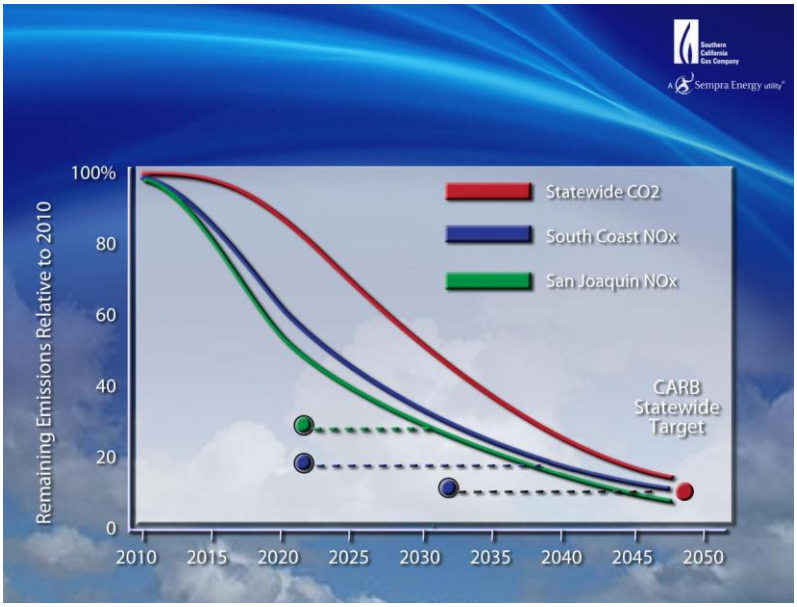
Furthermore this approach—setting carbon content for electric generation and incentives for lowering the carbon content—establishes an incentive for carbon capture and storage (CCS), a needed technology ARB identifies, but then undermines with a fuel phase-out mandate. Establishing carbon-content thresholds and incentives can both provide for near-zero and zero natural-gas technology pathways as well as facilitate CCS development.

(2) Natural Gas in the Transportation Sector is Key to Achieving Mid-Term Ozone Standards

The Discussion Draft seeks electrification and hydrogen use for transportation as the "only" alternatives (page 86), while referencing a "niche" role for natural gas—only to be phased out by 2050 (page 88). However, in addition to reducing GHG emissions, Southern California and the San Joaquin Valley face important near-term challenges to reduce criteria pollutant emissions, specifically particulate matter and ozone-precursor emissions. These priorities require immediate deployment of clean technologies, especially in the transportation sector. While, the transportation sector represents around 40% of California's GHG emissions, this sector accounts for over 80% of the oxides of nitrogen (NOx) emissions in the South Coast air basin and the San Joaquin Valley Air Basin.[3]

Currently planned pathways to GHG attainment (that rely heavily on electric vehicles and fuel-cell vehicles) do not happen fast enough to meet criteria pollutant targets. For example, turnover of heavy-duty trucks to cleaner technologies must occur more quickly to achieve the criteria emission reductions needed for attainment than to reach the 2050 GHG goal. Hence, we cannot rely only on long term GHG goals to drive compliance with criteria pollutant targets and must establish more aggressive near- and mid-term technology pathways, as illustrated in the chart below.

[3] SCAQMD is focused on reducing NOx emissions as the most expedient way to reduce ground-level ozone in the region. NOx is a pre-curser to ozone formation. Percentages are from the Vision for Clean Air Public Review Draft, June 27, 2012, p. 11 http://www.arb.ca.gov/planning/vision/docs/vision_for_clean_air_public_review_draft.pdf



In this vein, air districts now are now considering a multi-technology approach to achieve criteria pollutant goals. A multi-technology approach will rely upon even cleaner versions of natural-gas vehicles, as well as a heavy reliance upon electric vehicles and fuel-cell vehicles as these technologies mature beyond 2020.

The ARB and other air quality regulators are appropriately focused on the heavy-duty vehicle sector to achieve large NOx and GHG reductions. Since diesel-fueled heavy-duty vehicles and equipment are by far the largest source of ozone forming gases in the state, and since ozone reduction deadlines are quickly approaching, strategies that quickly reduce NOx emissions from this sector are of critical importance.

The use of heavy-duty engines powered by natural gas offers a unique and viable strategy to meet California's need for aggressive reductions of NOx and GHG emissions. This use also supports a variety of other state and national goals, such as reducing the public's exposure to toxic diesel-exhaust and reducing the nation's dependence on foreign energy sources.

In the transportation sector, there are viable technical pathways that help us meet our near-term ozone goals and our long-term GHG goals. Early reliance on cleaner heavy-duty natural-gas trucks achieves more NOx emission reductions sooner. The technology is here today. And, there are key technology strategies now available to make heavy-duty natural-gas trucks even cleaner as we approach 2023 (the next ozone attainment deadline) and beyond.

By moving to natural gas for heavy-duty trucks, we can immediately reduce GHG emissions by up to 20%. Over the mid-term, efficiency improvements from advanced engines, hybridization, and integration of improved aerodynamics and similar technologies should yield another 40-45% reduction to GHG emissions. In the long term, utilizing blends of renewable

natural gas and/or hydrogen can provide the remaining reductions (about 20-25%) needed to meet the state's 2050 GHG goals[4].

These technology pathways for heavy-duty natural-gas trucks can be expanded into other transportation sectors. The synergies that exist in these key technology pathways can achieve both NOx emission reductions and GHG reductions in the mid-term, and also for the long-term. Finally, technology advances in trucking can be transferred to rail, marine and other applications in the mid- to the long-term.

As the nation's supply availability of natural gas continues to grow, and natural gas prices, relative to gasoline and diesel fuel, continue to remain low, we see prolonged adoption of natural gas by ports and the freight movement sector. Adoption of natural gas as a transportation fuel will contribute significantly to achieving both GHG and NOx reductions, while sustaining long term job creation and economic opportunity.

(3) Natural Gas in the Stationary Source Sector is key to achieving long term goals

As in the Transportation sector, so in the Stationary Source market, there are long-term Pathways for natural gas. As natural gas technology pathways move stationary energy applications towards near-zero and zero equivalent thresholds, one must consider emissions associated with the production of energy upstream, whether it is electricity or even hydrogen.

The appliance and equipment manufacturing industry continues to develop highly efficient and ultra-low-emitting equipment for residential, commercial and industrial end uses.

We also see new end use technologies that help customers meet energy needs in different ways, like combined heat and power, micro turbines and fuel cells, all providing energy needs more efficiently than today, and all relying upon natural gas over the long term.

SoCalGas has a leading edge technology development program, but more funding will be needed over time, and ultimately a national effort will need to be undertaken to place natural gas technology funding on the national agenda to ensure continued use of this valued domestic resource with technology achieving lower and lower emission requirements.

While there will be a clearly defined role for natural gas power generation, alternatives beyond central power stations will need to be developed that will be flexible and appropriately scaled highly efficient gas technology to balance the intermittency of renewables, helping to integrate them into the grid, and grow the renewable portfolio over the long term.

Ultimately, non-combustion natural gas uses like fuel cells, new carbon capture technologies and renewable natural gas development will extend natural gas utilization over the long term horizon, providing an ongoing foundation for a clean energy economy

[4] Based on analysis by SoCalGas, ARB published well-to-wheels values and research by CalHEAT.

Unfortunately, the Discussion Draft's energy use mandate undermines the very technology investments needed to meet short and mid-term goals – acknowledged in the Discussion Draft; as well as long term goals.

(4) Renewable Natural Gas / Biogas

Renewable natural gas can play an important role in California's gas supply portfolio. For example, when renewable natural gas is injected into the pipeline network and is consumed by a Renewable Portfolio Standard (RPS) certified generation facility, the power produced is RPS-eligible and can be counted towards a utility's RPS goal. [5] A secondary benefit of renewable natural gas, unlike many other renewable technologies (such as wind and solar), is that it is dispatchable and does not require construction of new electric transmission lines.

When renewable natural gas is used as a transportation fuel in natural gas vehicles, the emissions are extremely low as the carbon intensity of renewable natural gas is approximately 14% of gasoline (based on dairy digester biogas)[6]. The use of renewable natural gas will not only help provide a more diverse gas supply portfolio but can also assist California in meeting its AB 32 goals.

SoCalGas has been a leader in supporting development of biomethane in the state. We have actively supported the development of the two facilities in the state that are conditioning biogas to pipeline quality and have issued a Biomethane Guidance Document to provide a process for non-landfill biomethane projects to interconnect to our system. SoCalGas has been studying the unique clean-up issues related to landfill gas for several years and is actively involved in the rulemaking called for by AB 1900 to seek ways to safely accept conditioned landfill gas onto the common carrier pipeline system. Furthermore, SoCalGas has filed a tariff that would provide biogas conditioning services on an optional basis to further develop biogas supplies in its service territory[7]. In the longer term, dedicated energy crops like algae, which do not displace food crops, and other renewable methane pathways such as solar thermochemical conversion can increase supplies still further.

(5) Natural Gas in the Electric Generation Sector is Key to Achieving Long Term Goals

Central Power Generation

California has long recognized the importance of fuel diversity in the power generation sector. Natural gas has been an important contributor to this fuel diversity. In the future, natural gas will continue to be needed as electricity demand grows in California – not just for baseload electric generation, but for peaking and leveling of intermittent renewable resources.

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[5] CEC RPS GUIDE: http://www.energy.ca.gov/2013publications/CEC-300-2013-005/CEC-300-2013-005-ED7-CMF.pdf

[6] http://www.arb.ca.gov/fuels/lcfs/lu_tables_11282012.pdf

[7] A.12-04-024. Under the proposed optional tariff, SoCalGas will condition (clean) biogas to pipeline quality standards or other standards specified by the customer for non-pipeline applications under special contract.

Natural gas generation in a variety of forms will be essential to integrate renewables into the grid and manage the stability of the grid, especially locally.

Closure of the San Onofre Nuclear Generating Station (SONGS) and lack of nuclear appetite in California will necessitate a variety of new generation resources. With the permanent shutdown of SONGS, the state has experienced a loss of over 2000 MW of GHG-free electric generation with an average capacity factor of 90%. Ensuring that California maintains reliability of its energy supply will require a mix of natural gas generation as well as distributed generation resources as part of the energy portfolio.

Additionally, a mix of distributed generation resources, including renewables like solar rooftops as well as natural gas fuel cells and micoturbines, will help us manage our load centers and our electricity demand.

Combined Heat and Power

California must continue to consider a portfolio of energy generation resources to meet the state's electricity demands. Well-designed CHP systems utilize waste heat to provide both electricity and heat, as well as delivering substantial GHG benefits over the long term period. In SoCalGas' technical perspective, when new CHP is installed, GHG benefits should be assessed by assuming that the electricity produced replaces the most inefficient baseload combined cycle gas generation. This approach should be adopted for calculation of GHG benefits and an appropriate allowance allocation component should be adopted to encourage GHG-reducing CHP installations.

These well-designed, gas-fired CHP systems remain an important part of California's effort to reduce GHG emissions. Because of their inherent ability to take advantage of an energy cascade, energy that is usually lost during the production of electricity can be used to offset the energy consumed for processing or heating and cooling needs. If sufficient care is taken to ensure the effective use of the thermal energy produced as a result of generating electric power, then CHP can be a significantly more productive use of natural gas than the most efficient gas fired combined cycles available on the market.

The ARB 2008 scoping plan called for 6.7 MMT of GHG benefits from accelerated deployment of CHP. Although ARB may find it appropriate to modify this target to some degree going forward, SoCalGas believes that the 2008 analysis was fundamentally on target and that ARB should maintain those CHP goals. The modest progress toward the 2008 goals should be addressed by removing barriers to CHP adoption including: elimination of excessive departing load charges, additional potential incentives with proper protocols for verification of GHG reduction, support for technology advancement, implementation of electric utility procurement programs and of other innovative utility programs such as utility ownership of CHP (and other distributed generation resources). These program designs support the development of fair and competitive markets for CHP while protecting ratepayers.

Other Efficient Distributed Generation Technologies

In addition to CHP applications, natural gas technologies can be highly efficient and provide both grid support and GHG benefits even when operating in simple cycle configurations. Fuel

cells are the best current example. With simple cycle efficiency exceeding 50% in some cases, these systems provide significant GHG benefit when grid losses are considered. When operated on directed biomethane, GHG reduction is nearly 100% while avoiding intermittency issues and potentially providing other support to the grid.

Another example is mechanical drive applications with heat capture. Mechanically-driven engines operate in a similar manner to CHP with the exception that they produce mechanical power instead of electricity. The engine shaft is typically used to drive a compressor, pump, or industrial process. Similar to CHP, waste heat can be captured and used to produce steam or hot water. This technology option offers similar GHG benefits when used in place of a CHP system but often with lower equipment costs. A mechanical drive system does not require an electric generator, invertor, or grid interconnection unless the waste heat is utilized in a bottoming cycle to generate electricity.

SoCalGas encourages ARB to carefully consider the GHG benefits of ultra-low-emission natural gas and renewable natural-gas solutions in revising the Discussion Draft and establishing appropriate regulations to promote their deployment.

(6) Energy Efficient End Use applications

Zero Net Energy (ZNE) Code Should Leave the Door Open for Natural Gas

The Discussion Draft references (p. 28) the state's zero net energy (ZNE) building goals set forth in the CPUC's Big Bold Energy Efficiency Strategies and under development by the California Energy Commission (CEC) as part of the Integrated Energy Policy Report (IEPR). [8]

SoCalGas is participating in the IEPR process submitted comments on the current and future role of natural gas in the ZNE home. ARB's statement in the Discussion Draft that CEC and ARB should pursue electrification options under the ZNE definition is premature and inconsistent with the recently signed Natural Gas Policy Act (AB1257), which requires the CEC to examine the role of natural specifically within the context of the ZNE.

Currently, natural gas is the preferred resource in homes for space and water heating due to both cost and overall energy efficiency of the home. Requiring a shift to electric-only equipment would be costly and could jeopardize the objectives and ability to implement the ZNE home requirement for 2020. For example, increasing the energy costs for the home could result in not meeting the cost effectiveness test for a ZNE home. Furthermore, natural gas water heating is substantially more efficient than electric water heating and replacing a natural gas water heater with an electric equivalent would actually increase GHG emissions when you consider full cycle emissions, which contradicts the objectives of AB32.

[8] CPUC Decision 07-10-032, October 18, 2007 and California Energy Efficiency Strategic Plan (Supplemental Draft), March 6, 2008.

SoCalGas requests that ARB remove language from the Discussion Draft that conflicts with the requirements of AB1257. Please see appendix A for suggested language changes.

(7) Fugitive emissions from Natural Gas Transmission and Distribution Systems

The Discussion Draft states (p. 36.) that ARB is currently updating emission factors via field measurements of fugitive emissions from natural gas distribution pipelines in California and expects the study to be completed in 2015.

SoCalGas would like the opportunity to review the field study results and to be involved in evaluating the cost-effectiveness of developing a regulation to reduce fugitive GHG emissions from natural gas distribution pipelines.

Furthermore SoCalGas, along with other California utilities, are participating in a nationwide scientific assessment and measurement through field studies of methane emissions from every segment of the natural gas industry including production, processing, transmission, distribution and a well to wheel analysis in the transportation sector. The study is being conducted by numerous national universities and overseen by the Environmental Defense Fund, and we would encourage ARB to review these results and consider them in its own updating of emission factors.

It has been our experience that there are many efforts underway to measure fugitive methane emissions, with varied methodologies, and widely varying reported results. Our focus has been to be sure to distinguish between petrogenic and biogenic sources, as well as differentiation of petrogenic sources, particularly in an area like the Los Angeles area which contains a multitude of petrogenic sources.

Conclusion

The AB 32 Scoping Plan Update should be based on sound science and a thorough understanding of technology development. The evidence clearly documents that the progress of natural gas utilization technology will ensure that natural gas is a foundational fuel, not just a bridge fuel, for a clean energy future.

Looking forward, natural gas will be a foundation for new energy pathways, delivering energy with virtually near zero emissions, sooner and more cost-effectively than relying on electric only technologies. The ongoing drive to reduce both criteria and GHG emissions, and to improve overall energy efficiency, will continue to reshape our gas technology and end uses.

We are already seeing emerge a new transportation pathway. Natural gas—as both CNG and LNG —is moving into the transportation market and not just for passenger and fleet vehicles, but also for heavy duty trucks and buses, for rail, and for port operations, including shipping, all of which are some of the biggest sources of air emissions in the LA area.

We also see continued use of natural gas in low emission and highly efficient residential, commercial and industrial end uses. This new natural gas stationary source pathway will see new end use technologies that will help customers meet energy needs in different ways, like combined heat and power, micro turbines and fuel cells—all providing multiple energy needs more efficiently than today, and all relying upon natural gas over the long term.

Thus, we see a mix of distributed generation resources, including renewables like solar rooftops, and gas technologies like micro turbines and fuels cells, helping us manage our load centers and our electricity demand.

We also know natural gas will continue to play an important role in electric generation—not just for base load central power plants, but also for flexible and appropriately scaled gas peaking technology that can balance the intermittency of renewables, helping to integrate them into the grid, and grow our renewable generation portfolio over the long term.

And over the longer term, new carbon capture and carbon use technologies will move into commercial deployment to assist the state in de-carbonizing its electricity sector. Carbon capture opens up new, long term pathways for the non-combustion use of natural gas; and will enable us to better leverage the symbiotic relationship among CO2, methane and hydrogen— for energy storage and for energy use.

To accomplish this vision, we encourage ARB to revise the Discussion Draft to not pick one energy source as the "winner" but instead be "technology neutral" and set performance standards that move the state towards its goals.

Thank you for the opportunity to participate in the development of the update to the initial AB 32 Scoping Plan and to submit these comments. Please see Appendix A for recommended revisions to the Discussion Draft.

Sincerely,

Tamara Rasberry

Appendix A

Recommendations (Proposed additions in green; deletions lined out):
SoCalGas suggests the following changes to the draft report, and requests the opportunity to propose additional improvements as we continue to work on the future versions of the 2013 Scoping Plan:

ARB seeks large scale electrification (page 75)

> "Large-scale electrification **or use of near zero and zero-equivalent technology for** ~~**of**~~ on-road vehicles and building and industrial appliances."
>
> "A large amount of electrification **or use of near zero and zero-equivalent technology for** ~~**of**~~ space and water hearting in buildings and machinery in industrial operations…"

ARB seeks to establish definition for "Zero Net Energy" buildings that would preclude use of natural gas (page 28)

> "…ARB and the CEC should analyze **use of near zero and zero-equivalent natural gas technology (per AB 1257) and other** alternatives ~~**to the use of natural gas**~~ for heating, cooking, and industrial processes **that balance emissions reductions with energy efficiency and cost effectiveness**, ~~**such as electrification or other non-GHG emitting alternatives,**~~ and assess the potential economic and technological barriers to switching to these alternatives."

ARB seeks electrification and hydrogen use for transportation as "only" alternatives (page 86), while referencing a "niche" role for natural gas – only to be phased out by 2050 (page 88)

> "Changing California's transportation sector to one dominated by **near zero or zero equivalent technologies including** ZEV's powered by electricity and hydrogen is essential to meeting federal air quality standards and 2050 climate goals."
>
> "Natural gas has an important ~~**niche**~~ role to play in contributing to California's air quality and GHG emissions goals in the transportation sector. Heavy-duty natural gas vehicles may offer significantly lower NOx emissions than current diesel technology, and ~~**slight**~~ improvements in GHG emissions. Increasing penetration of natural gas in the heavy duty truck sector could help to meet midterm air quality targets **and near zero and zero equivalent natural gas technology will have to be utilized** ~~**natural gas use will have to be mostly phased out**~~ to meet 2050 climate targets."

ARB seeks incentives for electric and hydrogen vehicles to exclusion of natural gas (page 89)

> "…additional, targeted financial and policy support and investment – including continued ZEV purchase incentives for electric and fuel cell vehicles **and for zero and zero equivalent transportation technology alternatives**…"