UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

NOV 23 2004

OFFICE OF THE
REGIONAL ADMINISTRATOR

Mr. Michael R. Peevey, President
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Dear President Peevey:

On November 9, 2004, Pacific Gas and Electric (PG&E) and Southern California Edison submitted applications to the California Public Utility Commission (PUC) requesting approval to provide incentives for agricultural growers to switch from internal combustion engines to electric motors for powering irrigation pumps. We are writing today to respectfully request that PUC prioritize consideration of these applications due to the significant air quality benefits that could result.

Irrigation pump engines are one of the contributors to poor air quality in the San Joaquin and Sacramento Valleys and in Southern California. Reducing emissions of nitrogen oxides and particulate matter from irrigation pump engines is one cost-effective solution for cleaning up the air. Therefore, over the past several years, the federal government, through the USDA Environmental Quality Incentives Program (EQIP), has provided over $3 million to supplement the substantial funding provided through the California Carl Moyer Program to replace older, dirtier irrigation pump engines. Most of that funding was spent helping growers change out to cleaner diesel engines because growers found diesel prices to be more affordable and stable than electricity. EPA believes that clean diesel is one of the tools that can be utilized to achieve our air quality goals. However, for many growers in California, the ultimate and preferred environmental solution would be to switch to electricity if they could afford it. It appears that the applications before you provide the affordability and stability that growers are seeking without adversely affecting the energy companies' existing customers.

EPA believes that electrification of irrigation pump engines will improve air quality in areas of California that desperately need it. In addition, electrification is the ideal solution for the environmental and regulatory issues facing many growers. We commend PG&E and Southern California Edison for working with growers and other stakeholders to find an innovative solution that benefits all Californians. This is the kind of creative approach that is needed to clean up the air as easy emission reductions become harder to find. Therefore, we encourage the PUC to prioritize these applications and act on them quickly.

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Please feel free to contact Deborah Jordan, Director of the Air Division for EPA's Pacific Southwest Region, at 415-972-3133 to discuss this.

Sincerely,

Wayne Nastri
Regional Administrator
Pacific Southwest Region

Jeffrey Holmstead
Assistant Administrator
Office of Air and Radiation

cc: Akbar Jazayeri, Southern California Edison
Janice Berman, PG&E
David Crow, SJVAPCD
Larry Greene, SMAQMD
Michael Boccadoro, Agricultural Energy Consumers Association
Dan Geis, Agricultural Energy Consumers Association
Mat Ehrhardt, Deputy APCO, YSAQMD
Dorene D'Adamo, CARB
Catherine Witherspoon, CARB
Kerry Drake, EPA