

April 23, 2015

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

SUPPORT for Sustainable Freight, Pathways to Zero and Near-Zero Emissions, Discussion Draft

Dear Chairman Nichols and Air Resources Board Members:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to comment on the Sustainable Freight, Pathways to Zero and Near-Zero Emissions, Discussion Draft. CalETC is a non-profit association with a board of directors that includes: Los Angeles Department of Water and Power, Pacific Gas & Electric, Sacramento Municipal Utility District, San Diego Gas & Electric and Southern California Edison. Our members include auto makers and other entities in the transportation industry.

California has established aggressive goals for market adoption of zero-emission vehicles, it is timely to accelerate the progress toward a zero-emission freight future. In general, we support and appreciate the thorough and thoughtful Discussion Draft. We have a few key points but also look forward to continuing to work with California Air Resources Board (CARB) and the stakeholder community in development of a Sustainable Freight Program:

- The CARB staff focus on the need for incentives in addition to regulatory programs is appreciated. This approach fairly recognizes the value of the freight sector to our economy and the fact that government has an important role in investing in the transition to a sustainable freight future.
- Including buses in the Discussion Draft is appropriate for the reasons articulated. Buses have long been the first place innovative clean technology is incubated and they are the ideal starting point to move from combustion engine to electric vehicle technologies. Past experience has demonstrated that clean technology options transfer from bus to other heavy-duty and off-road applications.
- As the Sustainable Freight program progresses it will be important to recognize the opportunities and potential for plug-in hybrid technologies. We urge the CARB staff to support all types of zero-emission technologies at this very early stage of market transformation. For certain applications, plug-in hybrid technologies may be the most economic and viable options for the long term, i.e. they are both transitional and long-term solutions in the context of sustainable freight.
- CalETC is working with ICF and E3 on Phase 3 of the Transportation Electrification Assessment. Phase 3 specifically evaluates grid and ratepayer impacts from electrification of the freight and bus sectors. We encourage CARB to consider these impacts as costs and benefits of the various technologies are analyzed. Electricity as a transportation fuel has some unique properties and benefits not typically considered by CARB.

CalETC is committed to continued engagement with stakeholders, the California Air Resources Board and state agencies supporting the growth and success of the ZEV market and the electrification of the transportation sector in California. We appreciate the opportunity to comment in SUPPORT of the Sustainable Freight, Pathways to Zero and Near-Zero Emissions, Discussion Draft.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eileen W. Tutt". The signature is fluid and cursive, with the first name "Eileen" and last name "Tutt" clearly distinguishable.

Eileen Wenger Tutt
Executive Director