R.J. Corman EcoPower respectfully submits comment on the proposed removal of the Energy Storage option for Rubber-Tired Gantry Cranes. While EcoPower understands the CHE regulations which require the crane operators to repower their cranes over time initiates the upgrading of the engine in many cases to a cleaner Tier 4 engine and/or the placement of a Level 3+ VDECS device, EcoPower stills sees a cost-effective option with our EcoCrane hybrid repower kit for both DC and AC motor cranes. The first EcoPower technology repower kit has been demonstrating successfully in Vancouver, BC for nearly 3 years. Two other kits have also been demonstrating at the Vancouver ports for a slightly shorter period of time. The success of these units has been fantastic both in reliability and in fuel savings of 70% or more. The company that is operating those units is negotiating for additional kits.

Just recently in the U.S., EcoPower has installed a kit on an RTG crane operating at Long Beach Container Terminal and while the operation has only been for a couple of months now the overall response has been very promising and options for additional units have been initiated by LBCT. Even more recently, the Port of L.A. was successful in their applying for DERA funds for the EcoPower technology to be installed on an RTG crane operated by Ports America which is also very impressed by the technology.

The EPA has listed the EcoCrane on it's Emerging Technologies List back in December of 2009 while EcoPower continues to plan for emissions testing using a protocol that will capture the benefits of the energy storage system which results in the engine running nearly half as much as a typical RTG crane engine which does not shut down during operation. While our intent is to fully verify the EcoCrane technology with both the EPA and CARB (Level 2 or possibly Level 3+ w/ DPF) we see a role for incentive funding to help.

While our system does involve a replacement of the engine with a much smaller, more efficient engine (currently Tier 3, but Tier 4 NR in mid 2011) the Prop 1B funding could offset the costs of the system by funding the energy storage portion while the operator could fund the engine costs as is required by the CHE requirements. This would allow for a system that would result in much more emissions reductions than would have been realized by the CHE requirements themselves while saving the operators a great deal in fuel and maintenance costs.

Allowing the option of funding a cost-effective energy storage system for RTG cranes would allow CARB and the crane operators to work together on a solution that would greatly benefit both. While keeping the option available certainly does not require the operators, ports or CARB to approve such projects, it certainly allows for a possible solution that is proving to be a solution of choice by many. While fully converting to electric is an option to fund, it is not always the most cost-effective nor the choice of many crane operators as it limits flexibility.

Please consider this comment when deciding on the best approach for the Prop 1B/GMP Guidelines and allow EcoPower to further discuss our technology and its possible fit into the program with you.

A presentation on the EcoPower EcoCrane technology is attached for your convenience.

Thank you very much for the opportunity to comment.

Scott Carpenter
GM-Emissions

RJ Corman Railpower LLC
scott.carpenter@rjcorman.com
814-434-7150 cell

RJ Corman
Railroad Group

R. J. Corman Railroad Group

RJ Corman
COPOWER
Hybrid Systems Inc.

R. J. Corman Overview

- Founded in 1973
- Located in 19 States and 1 Province
- Currently 814 Employees
- Working Capital In Excess of $60 Million
- Available Lines of Credit in Excess of $32 Million
- Debt to Net Worth Ratio is .34

R. J. Corman Railroad Group

RJ Corman
COPOWER
Hybrid Systems Inc.

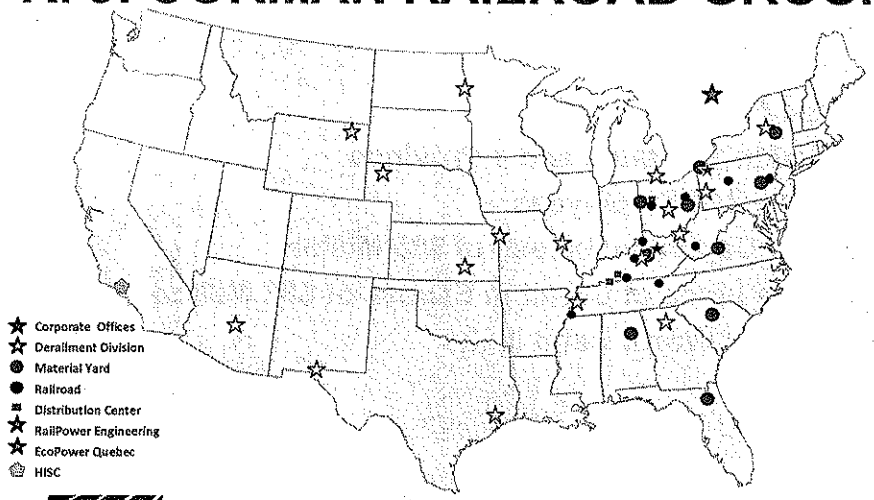
RJ Corman Railroad Group

A Limited Liability Holding Company

- 9 Shortline Operations In 5 States and Switching Services
- Railroad Construction Company
- 18 Derailment Divisions in 15 States
- 10 Material Sales Yards in 8 States
- RailPower
  - EcoPower
  - RailPower

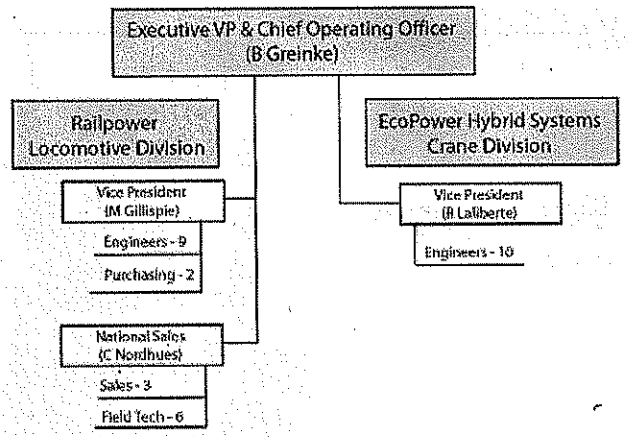
- Aviation Services & Aircraft Maintenance
- Equipment Leasing & Sales Company
- Distribution Centers
- My Old Kentucky Dinner Train

R. J. CORMAN RAILROAD GROUP



R. J. Corman Railpower

Organizational Chart



R. J. Corman Railroad Group

Total Number of Employees - 33

RJ Corman ECOPOWER Hybrid Systems Inc.

EcoPower Hybrid Systems Inc

Mission

- Develop, manufacture and sale an efficient hybrid crane solution
- Develop hybrid systems for industrial applications
- Provide technical services to Lithium battery manufacturers

R. J. Corman Railroad Group

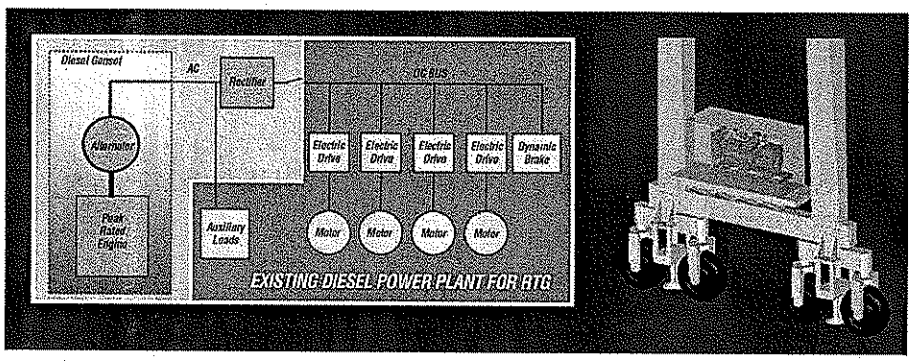
RJ Corman ECOPOWER Hybrid Systems Inc.

Rj Corman
COPOWER
Hybrid Systems Inc.

Brief Technical Description

Rj Corman COPOWER Hybrid Systems Inc.

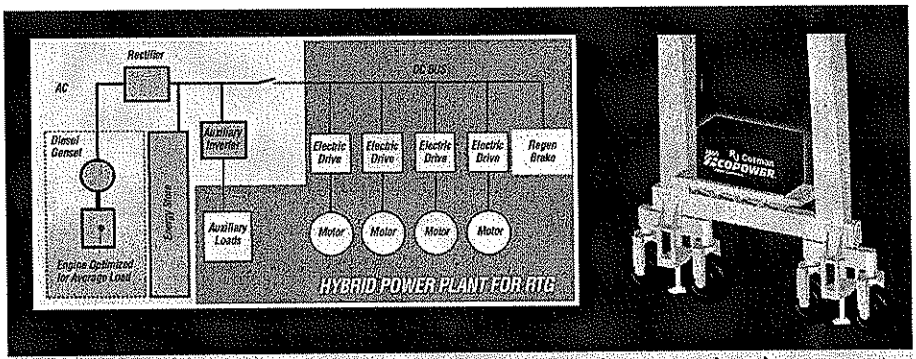
Conventional Power for RTG



Rj Corman COPOWER Hybrid Systems Inc.

Hybrid Power for RTG

EcoPower Patented Technology



Replace the old GenSet by the newest GenSet technology, battery pack and energy management system.

RJ Corman ECOPOWER Hybrid Systems Inc

Typical Crane Applications

Port Crane or Yard Cranes (OEM)

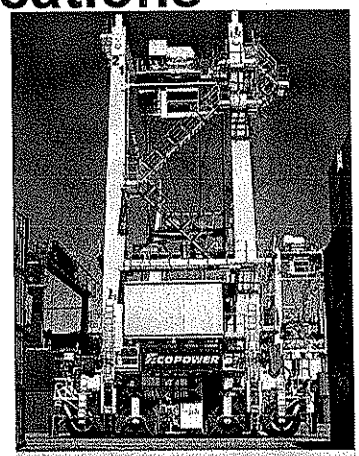
- Up to 60 long tons,
- Able to stack up to 5+1 containers high
- Up to 7 rows containers and 1 truck lane

Before Conversion

- 660 kW, 23 liter Cummins diesel engine
- 32 liters per hour fuel consumption (15 moves/hour)

After Conversion

- EcoCrane : 140kW engine + batteries + control



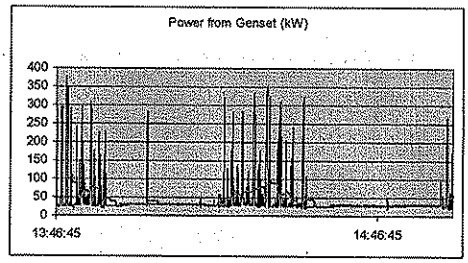
Up to 70% Fuel Savings With the EcoPower!

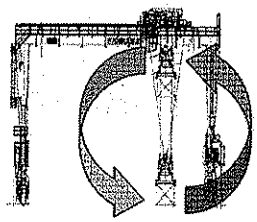
RJ Corman ECOPOWER Hybrid Systems Inc

How Do We Get The Fuel Savings?

1) Average power versus peak power; use of a smaller GenSet

2) Energy recovery through power regeneration





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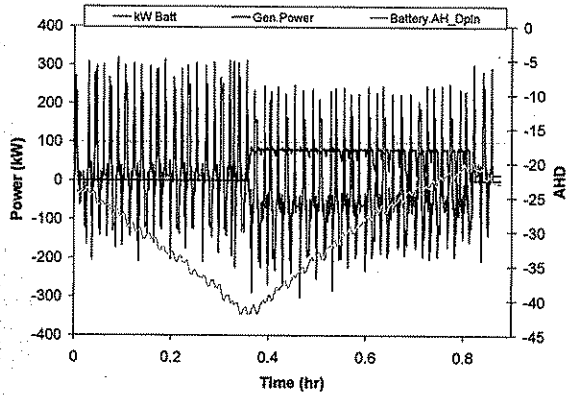
How Do We Get The Fuel Savings?

3) GenSet is running only portion of the complete cycle



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Typical EcoPower Fuel Savings

EcoPower Patented Technology

RJ Corman ECOPOWER Hybrid Systems Inc.

RTG 5+1/ DC bus	Idle control	15 lifts/hour average total operation	30 lifts/hour	Per 7200h (15lifts/h)
EcoPower	<0.5 USG/h	2.15 USG/h	3.17 USG/h	15480 USG
Cummins QSK 23	5.23 USG/h	7.22 USG/h	8.84 USG/h	51984 USG
Savings with EcoCrane	90%	70%	64%	-36504 USG
Cummins QSX 15	3.48 USG/h	5.50 USG/h	7.18 USG/h	39600 USG
Savings with EcoCrane	85%	61%	56%	-24120 USG
Deutz 1015	4.2	6.12	7.24	44064 USG
Savings with EcoCrane	88%	62%	55%	-27320 USG

The fuel economy could be affected by the auxiliary loads of the crane

RJ Corman ECOPOWER Hybrid Systems Inc.

EcoPower Emission Reduction

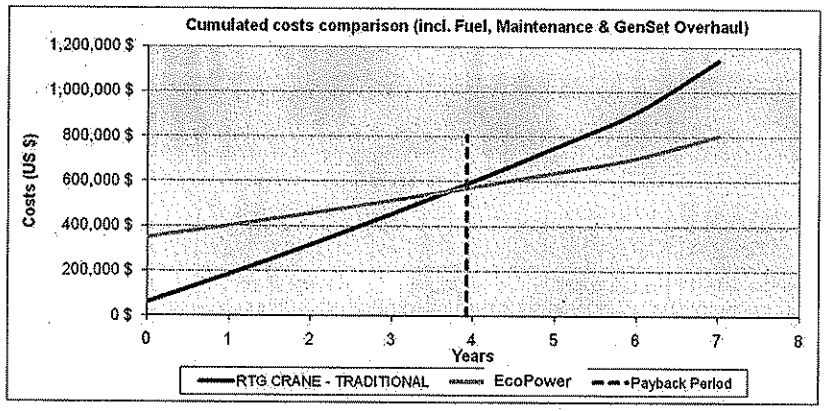
EcoPower Patented Technology

RJ Corman ECOPOWER Hybrid Systems Inc.

RTG 5+1 DC bus	GHG	NOx+HC	CO	PM
EcoPower	180 tons/yr	2 tons/yr	0.35 ton/yr	0.1 tons/yr
Tier 1 engines	610 tons/yr	Up to 32 tons/yr	Up to 2.6 tons/y	Up to 0.7 ton/y
Reduction with EcoPower	70%	70% to 94%	70% to 87%	70% to 85%
Tier 2 engines	460 tons/yr	Up to 22 tons/yr	Up to 2.0 tons/y	Up to 0.36 ton/y
Reduction with EcoPower	61%	61% to 91%	61% to 83%	61% to 82%

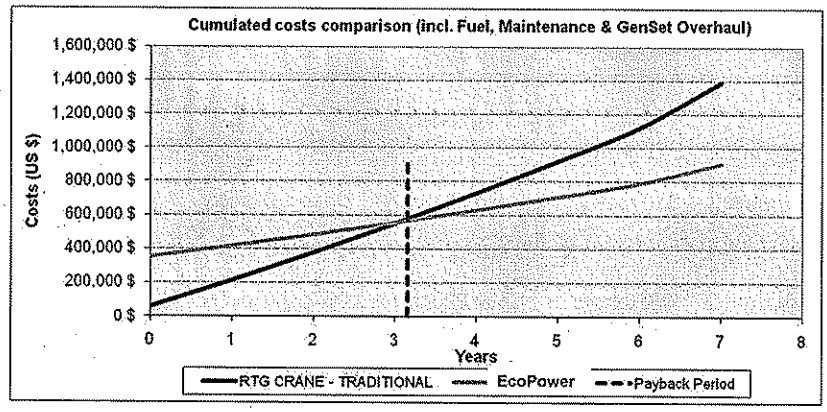
RJ Corman ECOPOWER Hybrid Systems Inc.

Typical Return On Investment



Fuel price: $2.80 US/gallon

Typical Return On Investment

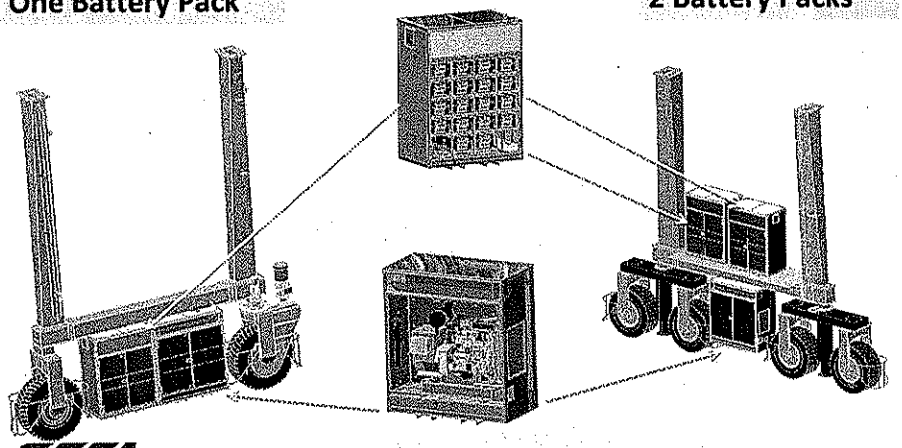


Fuel price: $3.50 US/gallon

Modular EcoPower Hybrid Systems

One Battery Pack

2 Battery Packs



RJ Corman ECOPOWER Hybrid Systems Inc.

EPA Emerging Technology List

Applied on the following types of cranes:

- 1+2 up to 1+7 RTG cranes
- With AC or DC motors

(Better fuel economy and ROI on cranes equipped with AC motors)

RJ Corman ECOPOWER Hybrid Systems Inc.

The EcoPower Superior Value

Offering exceptional service, a good return of investment without funding, and a design made truly for its daily users, the choice is clear:

EcoPower Hybrid Systems, taking you a generation ahead.

RJ Corman ECOPOWER Hybrid Systems Inc.

RJ Corman ECOPOWER®
Hybrid Systems Inc.