

01-04
Joyce Downs





2007
55 Employees
237 Machines



“OVERVIEW AND STAFF RECOMMENDATION”

**“Annual cost for a typical fleet would range from \$8
to \$9 per horsepower per year”**

Last paragraph on page 3 of
proposed rule.

COST OF RULE TO OUR 44,819 HP FLEET

**CARB staff highest average estimated
cost per HP per year**

44,819 x \$9 per HP = \$403,371 per year

\$2,016,855 over the first five years

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44,819 x \$9 per HP = **\$403,371** per year

\$2,016,855 over the first five years

Actual cost of compliance by Downs Equipment

44,819 x 8% re-power x \$328 per HP = **\$1,176,051** per yr.

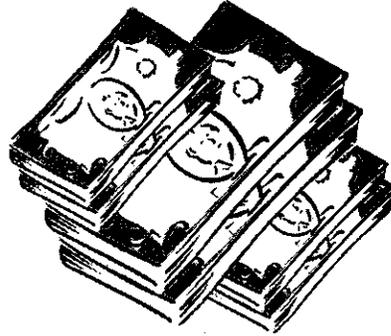
44,819 x 20% retrofit w/VDECS x \$146 per HP = **\$1,308,715** per yr.

ESTIMATED COST vs

ACTUAL COST

**CARB STAFF ESTIMATED
ANNUAL COST**

**ACTUAL ANNUAL COST TO
DOWNS EQUIPMENT**



\$403,371

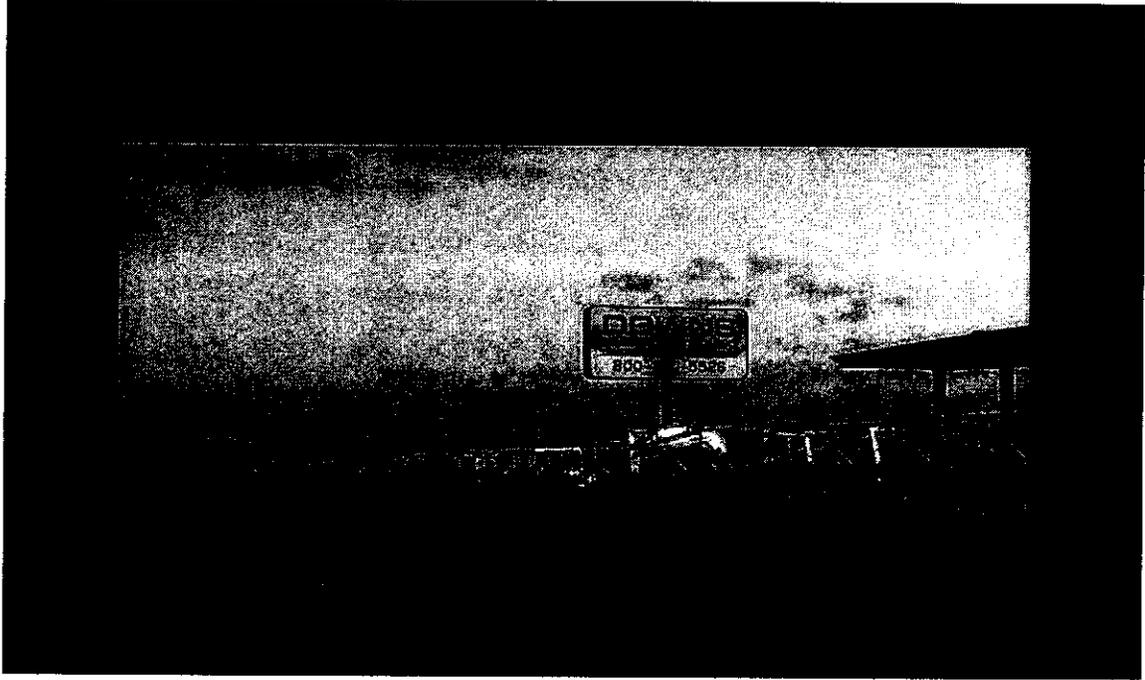
\$2,484,765

\$9 per HP per year

\$55 per HP per year

\$2,016,855 first five years

\$12,423,825 first five years



THE SOLUTION

- Cap at \$9 per horsepower per year maximum.
- 100% assistance funding similar to the current Carl Moyer program for any amount over \$9 per horsepower per year.
- Several year postponement to allow Tier 4 technology to become available.