



September 21, 2012

**To: James Goldstene, Executive Officer
California Air Resources Board**

**From: Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition**

Re: Comments on the Vision for Clean Air: A Framework for Air Quality and Climate Planning

The California Electric Transportation Coalition (CalEETC) supports the California Air Resources Board (CARB), San Joaquin Valley Air Pollution Control District and South Coast Air Quality Management District in their efforts to evaluate the transportation sector to better understand how clean air and climate change goals will be met in the future. We particularly appreciate the CARB and Districts' staff efforts to consider the multiple air quality and climate goals in a coordinated fashion. This approach allows for a more holistic picture of the challenges facing our state in meeting local, regional, state and federal greenhouse gas and air quality requirements. Further, it is clear that by considering the requirements in a coordinated fashion the staff illustrates the opportunities these challenges present. CalEETC believes that there are many benefits to electrification of the transportation sector and the vision document demonstrates those benefits in meeting multiple programmatic goals.

We appreciate CARB staff's commitment to running additional scenarios. We respectfully suggest that one scenario include a pathway that equally distributes the electric transportation options, both battery and fuel cells, and includes greater consideration for natural gas. We suggest this scenario replace the current scenario which selects hydrogen as the dominant fuel in the future. If the current scenario remains in the document, then the additional scenario or scenarios should include a pathway that assumes the other zero-emission or partial zero-emission vehicle technologies, battery-electric vehicles and plug-in hybrid electric vehicles, are dominant in the future. As the current scenario assumes hydrogen is the dominant fuel of the future including another scenario which assumes battery electric transportation is the dominant choice demonstrates that these scenarios represent possible future scenarios and do not represent technology preferences. CalEETC prefers that CARB remove any scenarios that select technology winners and simply represent zero-emission technologies evenly while also recognizing the benefits of natural gas and biofuels.

CalEETC looks forward to working with CARB and District staff as we move beyond the vision exercise and into implementation. CalEETC utilities are fully committed to electrification of the transportation sector, because it provides potentially significant benefits to all customers. Thank you for your consideration.



Sincerely,

Eileen Wenger Tutt
Executive Director

EWT/kmg

cc: Dr. Barry Wallertein, South Coast Air Quality Management District
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