

UTCP Comments on the Proposed 2008 ZEV Amendments

Good morning. My name is Dave Flanagan and I am the Automotive General Manager at UTC Power. We greatly appreciate the opportunity to provide comments on the Proposed Amendments to the Californian ZEV Program. We have also submitted a written statement that we hope you have an opportunity to read but due to time constraints, my oral comments will summarize our position.

UTC Power is a business unit of United Technologies Corporation and has over 50 years of experience in developing fuel cell products for on-site, transportation and space applications.

In transportation, UTC has worked with many of the world's major automobile manufacturers to develop technology and fuel cell powered vehicles. UTC, along with its partners Chevron and Hyundai, will operate 32 FCVs under the DOE's Hydrogen Learning Demonstration program including 27 here in California. Twenty-one are already on the road in California and have accumulated over 10,000 hours and 200,000 miles of real world experience. UTC is also powering 6 zero-emission transit buses including 3 at AC transit in Oakland and one at Sunline Transit in Palm Desert. These Californian buses have more than 10,000 hours and 100,000 miles of operation.

CARB's vision and its leadership in zero-emission vehicle technology has served as a catalyst for substantial investment and progress in the commercialization of sustainable transportation. California's initiatives have been instrumental in the deployment of fuel cell automobiles that have logged well over one million combined miles by members of the California Fuel Cell Partnership. UTC Power is a proud supporter of the Partnership since its inception and our president, Jan van Dokkum, is the current Chairman.

UTC has been a strong and consistent advocate of California's ZEV activities and the positive impact they have made in technology development. The ZEV rule is a groundbreaking model that has been followed by 10 other states. While it might be tempting to put a greater emphasis on Enhanced Advanced Technology PZEVs and Battery-EVs as an interim step, to remain a leader in ZEV initiatives, California must not lose its focus on hydrogen powered transportation that will be ultimately be derived from renewable fuels.

Therefore, UTC opposes changes to the current legislation that would dilute or delay the requirement for pure ZEV's and infrastructure. We believe the regulations should be founded on performance-based metrics where the definition of "zero" is not open for debate. Any wavering on the definition of "zero" or program delays will send a strong signal to stakeholders that are active in the commercialization of ZEVs. Investment capital, component manufacturers, vehicle OEMs and energy suppliers are heavily influenced by CARB's ZEV decisions. Any effort to slow the ZEV initiatives will likely result in a major shift of investment away from pure ZEVs and infrastructure. Significant progress has been made towards the commercialization of zero-emission automobiles and changes made to the regulations must not affect their steadfast introduction. Hydrogen powered vehicles have been demonstrated in service in California and that success should give CARB the confidence to maintain the current ZEV timeline.

California's sustained and unwavering commitment to the ZEV initiative is critical to the successful commercialization of transportation that will ultimately run on renewable fuels. It is essential that all proposed changes to the ZEV regulations be carefully considered with the long-term state goals and the potential of creating even further delays down the road. The eyes of the world are on California as a leader in climate change and sustainable transportation. Now is not the time for California to divert its focus away from renewable hydrogen powered vehicles.

Thank You,
Dave Flanagan

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