

**American Lung Association of California
Bluewater Network • California Electric Transportation Coalition •
California Natural Gas Vehicle Coalition • Coalition for Clean Air
Energy Independence Now • Natural Resources Defense Council
• Plug In America • Renewable Energy Action Project
Sustainable Conservation • Union of Concerned Scientists**

DOCKET	
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DATE	<u>OCT 24 2006</u>
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October 24, 2006

James Boyd, Vice Chair; Presiding Member, Transportation Committee
Jeffrey Byron, Commissioner; Associate Member, Transportation Committee
Robert Sawyer, Chairman, California Air Resources Board
California Energy Commission
Docket Office
Attn: Docket 06-AFP-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Dear Commissioner Boyd, Commissioner Byron, and Chairman Sawyer:

Thank you for the opportunity to provide comments on the state's Alternative Transportation Fuels Plan pursuant to AB 1007. The undersigned organizations seek to re-state the concerns expressed at the October 16 workshop regarding the plan's development and implementation process. It was evident that our concerns are shared by many.

We also wish to thank you for "hearing" our concerns, as Commissioner Byron noted at the end of the meeting, and for delaying the commenting deadline on the draft market assessment until November 2. Many of the groups signed on to this letter will also comment separately on the draft market assessment. We welcome that additional time to provide meaningful input.

The criticisms presented on October 16 reflect a general level of frustration that many of us have felt for some time about CEC's failure to engage with stakeholders and its rather mysterious and opaque process around AB 1007 implementation. We hope that this letter can initiate a more constructive dialogue leading to a more effective and open public process moving forward.

1. Engagement with Stakeholders

Over the last year, many of our organizations have sought to participate in this process. We have expressed a desire to be involved from the beginning, to provide technical input, to meet with staff, and to be involved in the working groups. While some meetings have occurred and one of the working groups has had calls, the process has suffered from a lack of clarity about how CEC will approach the work, the information you will need,

how that information will be processed and when each step will take place. Therefore, our ability to provide input has been limited. Although CEC initiated the process many months ago, it was unclear what was being done until the last few weeks, when the first workshop was announced.

We were dismayed to learn that the October 16 workshop sought comments on a report that had been drafted without any input from or interaction with key stakeholder groups, many of whom are members of the working groups. We may have been able to provide useful information to inform the first draft of the market assessment had we simply been asked.

We urge the commission and staff to avoid future headaches by fully engaging with all stakeholders.

2. Transparent Plan and Approach; Specific Timeline

If the AB 1007 plan is meant to be meaningful, it must incorporate input from all stakeholders and there must be time for meaningful review. We urge you to adopt a more comprehensive and transparent approach to developing this plan.

The October 16 workshop provided our first glimpse of the planned framework and rough timeline of activities. That information was enlightening, but insufficient. For example, staff indicated that one purpose of the October 16 workshop was to introduce the plan for the full fuel cycle analysis. Staff said there would be at least three more workshops before the analysis is released in January (only two and a half months away). When will those workshops be scheduled? On what aspect of the analysis will each workshop focus? How far in advance will stakeholders have access to information so that they can provide substantive, meaningful comments on each aspect of the analysis?

We urge staff to develop a written, detailed schedule with expected project deliverables so that all stakeholders can know when documents will be completed and when specific input is needed. Developing a detailed timeline—even if the dates must slip a little once the work is underway—provides all stakeholders with a roadmap for how and when staff will be working on different aspects of the plan.

3. Individual and Public Meetings

We pledge to make meetings with staff, consultants and other stakeholders a priority. We hope staff accepts our offer to be involved.

California's Alternative Transportation Fuels Plan is a significant undertaking and we respect the challenge that CEC faces in developing this plan. However, the effort we've seen to date does not reflect the importance of this plan in contributing to the state's petroleum, greenhouse gas and air pollution reduction goals. We look forward to improved dialogue and discussion in coming months.

Sincerely,

Bonnie Holmes-Gen, American Lung Association of California

Danielle Fugere, Bluewater Network

Dave Modisette, California Electric Transportation Coalition

Mike Eaves, California Natural Gas Vehicle Coalition

Tom Plenys, Coalition for Clean Air

Daniel Emmett, Energy Independence Now

Luke Tonachel, Natural Resources Defense Council

Chelsea Sexton, Plug In America

Brooke Coleman, Renewable Energy Action Project

Allen Dusault, Sustainable Conservation

Patricia Monahan, Union of Concerned Scientists