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October 1, 2012

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Docket No. 12-EPIC-01 – Comments from Total Transportation Systems, Inc.

To the California Energy Commission:

This letter is being sent in conjunction with the public comment solicitation for the California Energy Commission's "Electric Program Investment Charge Program" ("EPIC") Triennial Investment Plan ("investment plan"). TTSI is a national leader in the demonstration and deployment of renewable energy systems within the port trucking and warehousing industry. Our company was one of the leaders in the Ports' "Clean Trucks Program" and have deployed nearly 200 trucks to date into drayage service across a variety of models including LNG, clean diesel, hydrogen fuel cell and pure electric.

Although we support the draft investment plan in general, we strongly encourage the CEC (and subsequently the CPUC) to specify in greater detail their collective commitment to fund and demonstrate zero emission trucks throughout the State. Although there are several categories in the current draft of the investment plan which reference electric vehicles in the transportation industry, there is no specific category which deals exclusively with funding and demonstrating these technologies. Given our firm's past commitment to the successful deployment of Class 8 trucks running on electric or other zero emission platforms, we would encourage the committee to find "carve-out" opportunities for the funding of similar technologies in this investment plan.

For example, we have recently co-ventured with “TransPower Corporation” of San Diego, California on the planning and manufacturing of an all-electric port drayage vehicle. TransPower recently received a \$1 million grant from the California Energy Commission to help fund the manufacturing of this truck. Commissioner Peterman spoke about this award earlier this month during her press conference at Port Tech Los Angeles.

Although the current draft of the investment plan contains broad references to electric transportation, we would strongly encourage specific language on opportunities for electric trucks engaged in drayage or other heavy duty applications in the goods-movement industry. These technologies have already been shown to have interest among the many stakeholders including cargo owners and trucking companies alike.

We appreciate your consideration of these comments and stand ready to provide any technical analysis or details you may require.

Sincerely,

Vic La Rosa
President
Total Transportation Systems, Inc.