

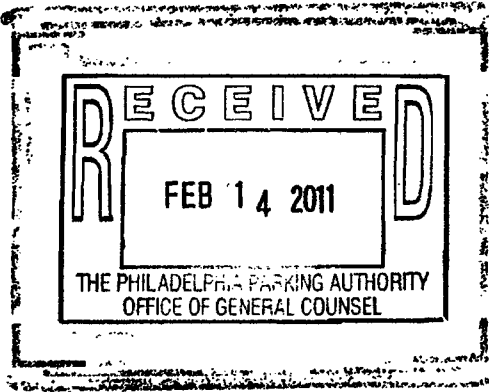
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February 11, 2011



Todd R. Campbell, MEM, MPP
Director of Public Policy

#010

The Philadelphia Parking Authority
Attn: General Counsel
3101 Market Street, 2nd Floor
Philadelphia, PA 19104

2011 FEB 14 P 4: 33
RECEIVED
IRRC

Re: Clean Energy Comments relating to docket number PRM 10-001 (126-1)

Dear Director Ney and the Members of the Philadelphia Parking Authority:

On behalf of Clean Energy, North America's leader in clean transportation, we would like to thank the Philadelphia Parking Authority for the opportunity to comment on Docket Number PRM 10-001 (126-1) which proposes to provide additional flexibility for hybrid taxicabs and wheelchair accessible taxicabs. Clean Energy has long been a supporter of policies that support cleaner transportation options and greater transportation accessibility to the general public. Furthermore, we fully support policies that reduce the country's dependence upon foreign oil and support the greater use of clean domestic fuels for transportation to improve both domestic energy security and the economic prosperity of the Commonwealth.

We strongly recommend that the Philadelphia Parking Authority include natural gas vehicles as a taxicab option that would enjoy the same benefits proposed for hybrid and wheelchair accessible taxicabs. In fact, we believe the Philadelphia Parking Authority might consider additional benefits to wheelchair accessible taxicabs powered by natural gas as this is a clean option for Philadelphia's ridership who have disabilities.

Pennsylvania is a Natural Gas Producing State

As you may be well aware, Pennsylvania has an immense natural gas supply that has been projected to last up to 50 years. The jobs created from the natural gas industry are long-term jobs that will keep Pennsylvanians employed for decades. Therefore, by creating incentives that promote natural gas use in the transportation sector, natural gas demand will increase, and as a result, will



help create thousands of jobs in the natural gas industry. Furthermore, natural gas vehicles today are significantly cleaner than their gasoline and diesel counterparts for both criteria air pollutants and carbon emissions. In fact, the California Air Resources Board has determined that natural gas vehicles reduce greenhouse gases (GHG) by up to 30 percent over their gasoline counterparts.

Strong Interest in Natural Gas Taxicabs in Philadelphia and throughout the Commonwealth

There is already a strong interest in natural gas taxicabs in Philadelphia and in natural gas as a transportation fuel throughout the Commonwealth. This has been evidenced by recent grant submittals to the Pennsylvania Alternative Fuels Incentive Grant (AFIG) program and recent legislative efforts at the state capitol to further support statewide natural gas vehicle adoption in both the public and private sectors. For example, a recent grant award was received by PHL Taxi to purchase and deploy 50 new ADA-compliant compressed natural gas (CNG) taxis in Philadelphia. Clean Energy intends to partner with PHL Taxi to construct, own and operate a new public access CNG fueling station. With the full implementation of this grant, this project is estimated to displace 210,000 gallons of gasoline, reduce approximately 473.12 metric tons of harmful emissions (i.e., GHG, CO, VOC, NOx, PM2.5) and provide approximately \$123,900 in transportation fuel costs savings. Additionally, this project is expected to create 34 local jobs, utilize the state's domestic energy resources and expand the use compressed natural gas (CNG) in the Commonwealth.

In addition to local efforts to bring CNG as an alternative option to foreign oil in the Philadelphia area, the Pennsylvania State Legislature has signaled its interest in providing various incentives to promote the use of natural gas vehicles in both public and private fleets. Although no legislation has been put forth as of today, it is anticipated that several pieces of natural gas vehicle legislation aimed at promoting the greater use of natural gas in the transportation sector will move forward.

Based on the foregoing, the Commonwealth has already recognized the benefits of clean-burning natural gas taxicabs in Philadelphia and is providing financial support to build a natural gas fueling station for taxicabs and to offset the incremental cost of VPG CNG MV-1 wheelchair accessible taxicabs. Accordingly, natural gas taxicabs should be afforded all of the maximum benefits received by taxicabs in any final set of regulations.

Hybrid Definition under Chapter 1017

First, it appears that the goal of this paragraph which defines the word "hybrid" is really to set forth the broader concept of "clean" or "green" vehicles. In



other words, hybrid vehicles are just one kind of “clean” technology. In an effort to encourage some flexibility in meeting a “clean” vehicle standard, perhaps this paragraph should be renamed “clean vehicles” and then it can list the specifications of the appropriate vehicles (for example, hybrid vehicles and natural gas vehicles).

Second, while we support the inclusion of hybrids, the proposed definition fails to apply any measurable standard that would ensure that the “the primary source of power for the motor must be the non-gasoline energy source.” In an effort to ensure that the Philadelphia Parking Authority’s objectives are achieved, we would recommend that the definition, at a minimum, include either a 45 mpg or better rating for city driving and a 50 mpg rating for highway driving or require that all hybrids must achieve, at a minimum, a 10 percent reduction in carbon intensity.

Natural Gas Taxicabs Should Also Be Incentivized under Chapter 1017.

For the past eight years, the Honda Civic GX, which runs on domestically produced natural gas, received top marks by the American Council for Energy Efficient Economy (or ACEEE) in its vehicle class, outperforming the Toyota Prius and other hybrid models. This is largely due to the fact that the Honda Civic GX achieves an Advanced Technology- Partial Zero Emission Vehicle (or AT-PZEV) rating – a rating that demonstrates near zero emission performance, zero evaporative emissions and substantially lower carbon emissions over gasoline and diesel. In fact, the superior benefits of natural gas vehicles over hybrids has been recognized at the state policy level as natural gas vehicles have been granted continued access to carpool lane privileges whereas hybrid access is being phased out. Furthermore, the increased production of renewable natural gas (RNG) for the transportation market, a fuel that can deliver up to a 90 percent reduction in carbon emissions, demonstrates the longevity of a natural gas strategy throughout the country recently designated as the Saudi Arabia of natural gas.

In addition, two new natural gas taxicab vehicles are now coming to the marketplace. First, a new American automobile manufacturer called The Vehicle Production Group LLC (VPG) is making the first commercial duty factory-direct CNG and wheelchair accessible vehicle (see www.vpgautos.com.) This vehicle, aptly named the MV-1, which stands for the first Mobility Vehicle, was designed from the ground up to benefit taxicab owners, drivers, and passengers. With a 290-mile CNG range, the MV-1 should be able to take taxicab fares in Philadelphia all day long without the need to refuel.

Second, Ford has now launched its CNG Transit Connect Taxi with a lot of fan fare. The CNG Transit Connect has already been approved by the Boston taxi



authority for use as a taxi and Ford is marketing the CNG Transit Connect Taxi all over the United States.

Moreover, a vehicle conversion company in Seattle called WorldCNG is modifying the Chevy Impala for CNG taxicab use, and many vehicles are on the road today in Dallas. Interestingly, to help incentivize the use of natural gas taxicabs, the Dallas City Council unanimously voted to allow taxi cabs that run on compressed natural gas the privilege of skipping to the front of taxi queues at the city's Love Field airport.

Natural Gas Vehicle Definition to be Considered

We recommend that the Philadelphia Parking Authority adopt the following definition for "natural gas vehicles" and include this definition within Chapter 1015 so that it enjoys the same benefits established under Chapter 1017 for both hybrid and wheelchair accessible taxicabs.

"Natural Gas Vehicle – Any motor vehicle that is powered exclusively by natural gas."

Modify Section 1017.5(b)(11).

Section 1017.5(b)(11) may preclude some natural gas vehicle models as this section specifies that a taxicab "must have a trunk or storage area large enough to accommodate a folded manual wheelchair." We would ask that this section make an exception for natural gas vehicles by modifying the language to read the following:

"The taxicab must have a trunk or storage area large enough to accommodate a folded manual wheelchair, unless it is powered by natural gas."

We recommend this modification because some natural gas vehicles utilize a portion of the trunk space to accommodate fuel storage. Further, we strongly believe that people with disabilities are entitled to clean air options just as much as any other patron. We therefore would ask that the Philadelphia Parking Authority include natural gas as a clean air option by extending the proposed incentives to all natural gas vehicles.

Clean Wheelchair Accessible Taxicabs Should Receive Greater Benefits.

The current proposal extends a benefit of 300,000 miles to wheelchair accessible taxicabs. While we fully support policies that create greater access to ridership, we also believe there is room to extend greater benefits to cleaner options for ridership with disabilities. We therefore ask that the Philadelphia

Parking Authority consider extending the mileage acceptance for natural gas powered wheelchair accessible taxicabs to 400,000 miles.

Clean Vehicle Incentive Programs.



In order to incentivize Philadelphia's taxicab owners and drivers to quickly transition their vehicles to clean vehicles, the Philadelphia Parking Authority could also consider programs which economically benefit the owners and drivers of such cabs. For example, the Philadelphia Parking Authority could consider adopting (1) front of the line privileges at airports (like Love Field in Dallas), (2) lower flag fees at airports, and (3) additional airport days if access is limited. As the proposed regulations are reviewed and modified, incentive programs like these should be considered to promote a cleaner taxi fleet.

Conclusion

Clean Energy would like to thank the Philadelphia Parking Authority for its careful consideration of our comments on the proposed Chapters 1015 and 1017 concerning Philadelphia taxicab service. We strongly believe that our comments will add flexibility, job creation, cleaner air, and greater energy security for the great Commonwealth of Pennsylvania. If the Authority should have any questions or need further input, please do not hesitate to contact us directly.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd R. Campbell".

Todd R. Campbell

Cooper, Kathy

2885

From: Patricia DeMarco [PDeMarco@philapark.org]
Sent: Monday, February 14, 2011 3:51 PM
To: IRRC
Cc: Smith, James M.; Dennis Weldon
Subject: Public Comment by Todd R. Campbell (Clean Energy)
Attachments: 110211.Comments byTodd Campbell (Clean Energy) (#010).pdf

Good Afternoon:

Please see the attached Public Comments from Todd R. Campbell on behalf of Clean Energy. These comments were received by The Philadelphia Parking Authority on February 14, 2011 and numbered as Comment #010.

Please record and post Mr. Campbell's Comments on IRRC's website.

The comments will also be forwarded to IRRC via Regular U.S. Mail.

Thank you.

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