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RE: Comments on fueling corporate fleets with Compressed Natural Gas as opposed to current systems using refined petroleum.

To: Public Utilities Commission

Before I line out my points for the Commission, I wish to thank you for your willingness to take comment on this most important issue. It is obvious to me that we are at the cliff's edge with regard to energy requirements required to sustain the economy of not only the United States but the entire industrial world. We shall not be able to sustain the continued reliance on refined petroleum products given the unrest in the middle east and the rapidly increasing costs (environmentally and monetarily) to find and produce more of the same. We must make long-ranging decisions to work abundant, clean, safe and less costly means of meeting the industrial and fleet demands. The alternative will lead us to economic disaster.

Compressed Natural Gas (CNG) is an immediate alternative to refined petroleum for the following reasons.

- a. CNG is abundant and transmission lines are already in existence. What this means in simple terms is that fueling stations (of which there are more than 1,300 at this present time) will and can come on line very quickly to replace current technologies.
- b. CNG currently costs 1/3 of the price of gasoline. If you look at the market, the cost of CNG is also much more stable than refined petroleum. This is a huge bonus for transportation fleets in that they will be able to not only save millions of dollars but will also be able to project the fleet operational costs with greater accuracy.
- c. CNG burns cleaner than current ethanol /gasoline fueling systems. The result is lower maintenance costs on fleet vehicles.
- d. CNG offers the best CONVERSION technology for vehicles that are currently operating on gasoline. Conversion kits are readily available for vehicles from Ford, Chevy, Mazda, BMW, Daimler, Chrysler, Volkswagen, etc...
- e. CNG is SAFE! Having witnessed fatal collisions involving gasoline fueled vehicles, I long for the alternative. Compressed Natural Gas is stored in cylindrical tanks that are much stronger than current fuel tanks. When and if an accident were to occur with significant force to break the cylinder, the CNG dissipates into the atmosphere and does not pool and become a fire hazard. Also, Compressed Natural Gas has a much narrower range of flammability than that of gasoline. CNG will not burn in air that is below 5% and above 15%.
- f. Compressed Natural Gas is 90% CH<sub>4</sub> and has a higher octane rating than gasoline. Compression ratios can be raised and this results in greater efficiency in operation.

- g. CNG is the correct choice to sustain the environment. It is a fact that internal combustion engines operating on Compressed Natural Gas produce fewer hydrocarbon emissions than their gasoline fuelled equivalents. (70% less CO, 87 % less non-methane organic gas, 87% less NOX, and 20% less CO2.) While releasing CH4 into the atmosphere is often cited as a downside of CNG fuelled vehicles, it is important to note that this is offset by the reduction of CO2 emissions.

I have heard much talk of the danger of CNG filling stations within local neighborhoods. These fears are, in my estimation, purely a lack of understanding of the technology. Protocol would be in place to “drain-down” fleet vehicles and park them outside of a facility that would expose personnel or neighborhoods to any hazard. Secondly, all filling of fleet vehicles, etc... would be in an area that is located as specified safe distance from any structure that personnel would reside. Gasoline stations basically came about as a result of need to fuel existing internal combustion engines and very little thought was put into the placement of dispensing operations. It is true that “after the fact” of filling station catastrophic explosions, that regulation came down from above. However, with CNG we have the opportunity to design and plan the safest most efficient fueling system possible right from the inception.

I go back to my initial statement in closing. We are at a cliff that can literally lead to mayhem within the industrialized portions of the world. Compressed Natural Gas offers the best alternative to existing technologies to keep the wheels of progress turning.

Thank you for taking my comments.

Sincerely,

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