Bill LaFortune
MAYOR

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October 22, 2002

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Linda Bluestein
U.S Department of Energy
Office of Energy Efficiency and Renewable Energy
Office of FreedomCAR and Vehicle Technologies
Docket No. EE-RM-02-200, EE-2G
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: A Discussion of Issues Pertinent to the Rulemaking to Designate FTD fuels as Alternative Fuels Under Section 301(2) of the Energy Policy Act of 1992

Dear Ms. Bluestein,

With regard to the referenced DOE considerations, we support designation of non-Domestic Fisher-Tropsch diesel (FTD) fuels as "Alternative Fuels" under the Energy Policy Act of 1992 (EPAct). Such designation would be a positive step toward enhancing our national security as well as our environment. We also believe that it is a logical step, given that domestically produced FTD fuels are already qualified as alternative fuels.

We understand the key considerations for Alternative Fuel designation under EPAct are that the candidate fuel is substantially not petroleum, and would yield substantial energy security benefits and substantial environmental benefits. We offer the following observations for these three issues:

1. FTD fuels would primarily originate from clean natural gas feedstock, clearly a non-petroleum source.

2. Production of FTD fuels would certainly contribute to greater energy security. These fuels would be converted from abundant stranded natural gas deposits in many global locations-gas that is already discovered but lying dormant because it's too far from market to be economically monetized in its gaseous state. Utilization of these stranded reserves would

the lack of sulfur and other contaminants, would enable vehicle manufacturers to apply emission control technologies that would eliminate or greatly reduce vehicle emissions of particulate matter, hydrocarbon and other harmful pollutants.

Compounding the above benefits is the fact that diesel engines are approximately 40% more efficient that gasoline engines. Introducing more clean diesel engines into our vehicle fleets would enable vehicles to do more work and travel more miles while using less fuel. Another important aspect is that FTD fuels can be distributed within existing infrastructures and applied to vehicles that are already in service.

We hope that our prospective might be helpful in your ongoing considerations of giving non-domestic FTD fuel Alternative Fuel status under EPAct. We support granting FTD with EPAct alternative fuels status.

Sincerely,

Michael Willis
Deputy Chief for Policy and Development
Mayor's Office