

## DOCKETED

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*Comment Received From: F Kent Leacock*

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**Proterra ARFVTP Draft Investment Plan Comments**

*Additional submitted attachment is included below.*



November 7, 2016

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re: Comments on the 2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program

Dear California Energy Commissioners and Staff,

Proterra appreciates the opportunity to provide comments on the 2017-2018 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP). We support the Energy Commission's goals to develop and deploy advanced transportation technologies to help implement California's climate change policies, including AB 32, SB 32, and AB 118/AB 8, and the Governor's Zero-Emission Vehicle Action Plan.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus and features on-route, fast-charge technology that offers functionally unlimited range, as well as an extended range version that enables transit agencies to travel ~350 miles on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and reducing carbon emissions by 70% or more compared to CNG or diesel buses.

Proterra strongly supports the Energy Commission's ARFVTP, which has helped develop and demonstrate innovative alternative fuel technologies to accelerate the use of advanced, zero-emission heavy-duty vehicle technologies. Proterra appreciates the California Energy Commission's investment in Proterra's West Coast zero-emission bus manufacturing facility. Following the Energy Commission's support for the manufacturing facility in the City of Industry, we moved our Corporate Headquarters to Burlingame, California from the East Coast—allowing future zero-emission buses deployed in California to be designed and manufactured by Californians and supported by California supply chains.

Proterra strongly supports the allocation of a minimum of \$5 million to expand in-state manufacturing for medium- and heavy-duty zero-emission vehicles and vehicle components. Designing and manufacturing vehicle components, such as state-of-the-art batteries with extended range capability, will help eliminate range-anxiety and expand the duty-cycle and deployment of heavy-duty zero-emission technology throughout California – helping to directly achieve the air quality, greenhouse gas emission, and petroleum use reduction goals of the ARFVTP. Developing and manufacturing extended-capability batteries for zero-emission public transit buses is needed to accelerate deployment of zero-emission, heavy-duty vehicles and provide the transferability of zero-emission battery electric technology to other heavy-duty, class-8 vehicles and freight applications - as transit buses have consistently been the forerunners in advancing heavy-duty transportation technology and transferring lower-emission technology throughout the heavy-duty sectors.

Proterra also supports the Energy Commission's proposed allocation of \$18 million for Advanced Freight and Fleets to develop and demonstrate advanced vehicle technologies. Our specific comments include:

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- To further the advancement of medium- and heavy-duty alternative fueled vehicles, we strongly encourage the Energy Commission to expand eligibility for all zero-emission medium- and heavy-duty technologies that can demonstrate and provide near-term technology transferability to other heavy-duty sectors, such as freight opportunities in and around the ports and congested goods movement corridors throughout California and beyond. In addition, we strongly suggest that the Energy Commission broaden applicant eligibility to include all public agencies, cities, and organizations. Expanding the applicant and technology eligibility will provide the opportunity for the Energy Commission to support the best projects that help implement the Energy Commission's key policies and regulations, including the Sustainable Freight Action Plan and AB 32, SB 350, Clean Air Act, ZEV Mandate, and State Alternative Fuels Plan. This more inclusive and merits-based process will enable the Energy Commission to invest in strongest projects that carry out all of the Commission's policies and regulations.
- We support the inclusion of both infrastructure deployment and vehicle demonstration as eligible project components because infrastructure is a key component for a successful vehicle demonstration project. In addition, we support including eligibility to develop innovative charging systems, including renewable energy charging solutions, high-density EV charging and demand-response programs to reduce grid impacts and demand charges. We recommend limiting the infrastructure component to 20% of the total project funds in order to help ensure that the majority of the funding is dedicated towards the vehicle demonstrations that directly reduce greenhouse gas emissions and improve air quality.
- We recommend the Energy Commission continue to focus on early demonstration and pilot projects for the Advanced Freight and Fleets category. The Energy Commission's Advanced Transportation Program plays a critical role in developing and demonstrating innovative technologies that can transform transportation to sustainable, zero-emission technology to help attain the state's climate change policies and goals. Specifically, there is an immediate need to further develop and demonstrate heavy-duty battery efficiency improvements to significantly increase range and duty-cycle in Class-8 vehicles, which accelerates the transfer of zero-emission heavy-duty technologies to all applications of transit, logistics, and freight in California.

Thank you for the opportunity to provide comments on the 2017-2018 Investment Plan Update for the ARFVTP. We look forward to continuing to work with the Energy Commission to accelerate the development, demonstration, and commercialization of cost-effective, near-term heavy-duty technologies that eliminate mobile emissions throughout California.

Sincerely,

*F. Kent Leacock*

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