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Letter of Support, First Priority GreenFleet

Additional submitted attachment is included below.



A member company of



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November 4, 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,

First Priority GreenFleet (FP GreenFleet) 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 goals to accelerate advanced transportation technologies and tools to help carry out the State's climate change initiatives, including the Governor's Zero Emission Vehicle Action Plan, Sustainable Freight Action Plan, AB 32, SB 32, and AB 118/AB 8.

FP GreenFleet provides sustainable fleets, offering a full range of zero-emission vehicles and infrastructure. FP GreenFleet is a division of First Priority Global, which is one of the largest and most reliable providers of specialty commercial fleet vehicles in the United States. FP GreenFleet's mission is to revolutionize the industry with a customer-centric service network—continuing the legacy of First Priority Global's success deploying and servicing specialty commercial fleets and now expanding its core expertise to bi-coastal manufacturing with an extensive service network.

FP GreenFleet recently acquired all the assets and intellectual property of Electric Vehicles International (EVI), and is very proud to expand manufacturing of EVI's zero-emission medium-duty delivery trucks at the EVI facility in Stockton, California. In addition, FP GreenFleet offers the first zero-emission, purpose-built school buses in North America – a Type C by Lion Bus and a Type A by Trans Tech/Motiv. First Priority is committed to serving school districts with state-of-the-art electric school buses that eliminate toxic exposures and improve safety for students. School buses are the largest segment of mass transit in the United States and, unfortunately, are among the oldest and dirtiest fleets on the road.

FP GreenFleet strongly supports the Energy Commission's proposed allocation of \$18 million for Advanced Freight and Fleets to demonstrate and deploy advanced vehicle technologies in California and we offer the following comments:

- We respectfully request expanding the eligibility of this program beyond seaports to include all components of California's freight system in order to further reduce greenhouse gas emissions, reduce petroleum use, and improve air quality. Expanding applicant eligibility will provide the opportunity for a greater and more significant impact
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on goods movement in California. A more inclusive and merits-based process will allow for the Energy Commission to support the best and most beneficial 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.

- 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.
- We suggest the Energy Commission continue to prioritize demonstration and pilot projects for the Advanced Freight and Fleets category for all medium- and heavy-duty advanced transportation vehicles. This program is critical role to 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. The funding is needed to further accelerate and expand medium- and heavy-duty vehicle deployments to reduce greenhouse gas emissions and improve air quality.

FP GreenFleet supports the \$17 million for electric charging infrastructure. We respectfully request amending the program to a voucher or rebate program rather than a time-intensive, grant based program - similar to the Air Resources Board Hybrid and Zero-emission Truck and Bus Voucher Incentive Project (HVIP). This structure will help accelerate deployment of the infrastructure needed to support medium- and heavy-duty zero-emission demonstration and deployment projects.

FP GreenFleet also supports the proposed allocation of at least \$5 million to expand in-state manufacturing and accelerate commercialization of advanced vehicles and vehicle components in order to continue the success of zero-emission vehicle manufacturing in California. Designing and manufacturing vehicle components in California will help to directly achieve the air quality, greenhouse gas emission, and petroleum use reduction goals of the ARFVTP. Developing and manufacturing advanced technologies for short haul medium-duty truck technologies is needed to provide the transferability of zero-emission electric technology to other heavy-duty, class-8 vehicles and freight applications.

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 together to accelerate the deployment of medium and heavy-duty zero-emission technologies in California.

Sincerely,



Alex Cherepakhov
Chief Executive Officer
