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Proterra Comments of ARFVTP Investment Plan

Additional submitted attachment is included below.



November 20, 2018

California Energy Commission
1516 9th Street
Sacramento, CA 95815

RE: 2019-2020 ARFVTP Investment Plan

Dear Commissioners and Staff,

Thank you for the opportunity to provide comments on the Energy Commission's 2019-2020 Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) Investment Plan. Proterra strongly supports the effort to deploy zero-emission infrastructure and vehicles in California in order to reduce GHG and criteria pollutant emissions.

Proterra designs and manufactures the most efficient vehicle in its class with the greatest range per kWh of energy storage. Proterra's CATALYST® bus achieves up to 29 MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions. Proterra moved our Corporate Headquarters to Burlingame, California from the East Coast and expanded manufacturing to the City of Industry, California —allowing future zero-emission buses deployed in California to be designed and manufactured by Californians and supported by California supply chains.

Proterra supports the goals of the ARFVTP and its guiding legislation. Within the proposed investments for electric vehicle charging infrastructure, Proterra strongly supports inclusion of incentives for medium and heavy-duty infrastructure to help accelerate the deployment of zero-emission vehicles and eliminate emissions in the highest polluting transportation sector. In addition, funding for medium- and heavy-duty vehicle infrastructure will help transit agencies implement the Innovative Clean Transit initiative, as well as accelerate zero-emission vehicle deployments for airports, school districts, and other public and private fleets.

We strongly support developing separate guidelines for medium- and heavy-duty vehicle infrastructure deployment, as they support different types of vehicles and duty-cycles. For example, medium- and heavy-duty vehicles are typically deployed in public and private fleets, such as public transit or school buses, and are not usually open to the public for charging. In addition, medium- and heavy-duty vehicle infrastructure typically does not require the need for multiple connectors, as most fleets use a single technology and charging infrastructure and the additional connectors would be underutilized. We are glad to be a resource to provide information and lessons learned on deploying medium- and heavy-duty charging infrastructure for fleets.

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Additionally, Proterra strongly supports the proposed allocation for manufacturing and workforce development, and respectfully requests that this category include eligibility for ZEV vehicle manufacturing in addition to infrastructure. Expanded manufacturing capacity of zero-emission transit buses is especially needed in California to support the implementation of AB 32, the Governor's ZEV Executive Order and ZEV Action Plan, as well as the goals of AB 118 and AB 8. There is a real opportunity for these policies and investments to help maintain and grow California's vehicle manufacturing workforce, improve the sustainability of current manufacturing operations, accelerate economic and environmental benefits, provide lasting greenhouse gas emission reductions, eliminate toxic emissions in communities throughout California, and provide electric miles for all--especially benefiting California's disadvantaged communities.

Thank you for the opportunity to provide comments on the development and implementation of ARFVTP. We look forward to continuing to work together to help carry out the goals of the program.

Sincerely,

Kent Leacock

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