

DOCKETED

Docket Number:	18-ALT-01
Project Title:	2019-2020 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program
TN #:	225933
Document Title:	Lion Electric Co. Comments on ARFVTP Investment Plan
Description:	N/A
Filer:	System
Organization:	Lion Electric Co./Nate Baguio
Submitter Role:	Public
Submission Date:	11/20/2018 3:08:20 PM
Docketed Date:	11/20/2018

Comment Received From: Nate Baguio
Submitted On: 11/20/2018
Docket Number: 18-ALT-01

Lion Comments on ARFVTP Investment Plan

Additional submitted attachment is included below.



November 19, 2018

California Energy Commission
1516 9th Street
Sacramento, CA 95815

RE: 2019-2020 ARFVTP Investment Plan

Dear Commissioners and Staff,

The Lion Electric Co. Team appreciates the opportunity to provide comments on the Energy Commission's 2019-2020 Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP) Investment Plan. Lion strongly supports the ARFVTP program and continued efforts to spur deployment of zero-emission vehicles and infrastructure to reduce harmful GHG and criteria pollutant emissions.

Lion is a leading Original Equipment Manufacturer of all-electric vehicles, including zero-emission school buses and zero-emission trucks, with deployments in California, New York, Massachusetts, and other states across the nation. Today, there are currently over 150 electric school buses in operation in North America that have been carrying kids to school every day safely for the last 3 years, with over 2.5 million miles of service provided.

Lion strongly supports the goals of the ARFVTP and the proposed allocations included in this Investment Plan, including the \$32.7 million allocation for zero-emission vehicle infrastructure. Within this, Lion supports inclusion of incentives for medium and heavy-duty infrastructure. This will help additional fleet operators, including school districts, transit agencies, and other public and private fleets to transition to zero-emission faster. We support additional criteria within these investment for medium and heavy-duty vehicles, as these fleets are often public and private, such as school districts, transit agencies, airports, but are not open to the public. Additionally, these vehicles have different levels of energy use as compared to light-duty. Continued investment in infrastructure will be critical to accelerating deployments of zero-emission vehicles across all types and sizes, and we look forward to working with the CEC to better understand these differences.

Lion also strongly supports the proposed allocation for manufacturing and workforce development. Lion recently announced the opening of its Lion Experience Center in Sacramento, Calif., which is designed to help educate fleets on electrification. The center is a teaching space available for school districts, fleet operators and agencies to learn about EV capabilities, charging, as well as get tours of vehicles. Lion hopes to expand its educational and workforce training in Sacramento and California and supports continued investment in both manufacturing and workforce development.

Additionally, while it is not a part of the ARFVTP program, Lion strongly supports the School Bus Replacement Program and thanks the CEC staff for its work to date on implementation. 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. School children are sensitive receptors and face elevated health risks from exposures to toxic air contaminants from diesel emissions while riding and being near California's existing fleet of dirty diesel school bus, which disproportionately expose students to toxic air contaminants and associated health risks. With demand from School Districts expected to greatly exceed available funding, we support further investment for this program to help improve California's school bus





fleet composition, reduce emissions from the transportation sector, improve air quality, and help reach our 2050 climate targets.

Lion appreciates the development of the proposed 2019-2020 ARFVTP Investment Plan and looks forward to working with the Energy Commission to implement its program.

Sincerely,

Nate Baguio
Vice President of Sales

