

DOCKETED

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June 7, 2019
RE: AZB-EJL-19-012

Zachary Dextraze, Commission Agreement Officer
California Energy Commission
1516 Ninth Street, MS-18
Sacramento, California 95814

Subj: GFO-18-604

Dear Mr. Dextraze,

As the President and CEO of A-Z Bus Sales, I would like to commend and thank the Energy Commission for the opportunity created through the school bus replacement project set forth through GFO-17-607 and 18-604. This funding will directly impact school districts, students, and communities across the state through the replacement of high-pollutant diesel buses with clean zero-emission technology, as well as promote further adoption of ZEV vehicles throughout the state. We are excited to be working with the Energy Commission on the procurement, delivery and support of zero-emission school buses to school districts who choose one of our 6 different school bus solutions.

We were surprised at the results of the NOPA for GFO-18-604, released June 3rd, 2019, and wish to bring to the Energy Commission's attention a few critical points that we feel must be addressed with regards to the proposed awardees. It is not our intent to delay proceedings or the timeline of awards, but to bring to light certain matters we feel should be considered or investigated to ensure the recipients of the proposed bus awards are receiving buses that meet the requirements of the bid as established by the Energy Commission and are able to transport California students safely.

First, with regards to the Type A award, it is important to note that according to the National Standards for School Buses and Operations, as revised in 1990, the Definition of a Type A school bus is as follows:

"The Type "A" school bus is a conversion or body constructed upon a van-type compact truck or a front-section vehicle, with a gross vehicle weight rating of 10,000 pounds or less, designed for carrying more than 10 persons." (Page 4: <https://www.ksde.org/Portals/0/School%20Bus/1990NCST.pdf>)

Further clarification on body joints (Page 13, Construction #3) stresses the parts of a Type A school bus that are specifically manufactured by the body manufacturer as opposed to components furnished or provided by the chassis manufacturer.

We believe the LionA or "mini school bus" does not meet these requirements as it is not a conversion or body constructed on a standard OEM chassis, as defined by the Type A category of school buses. While the LionA does not meet the definition of a Type A school bus, there are also concerns regarding the safety and construction of the monocoque design, which has not been fully tested by the school bus industry. Recently the New York Office of General Services suspended the Lion Electric Co's monocoque electric school bus (listed as Type A) due to similar concerns and they may no longer be purchased in the State. As this is the first bid in the state of California the Lion Electric Co has submitted their monocoque



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design school bus as a Type A applicant that we are aware of, it is of critical importance that these concerns are addressed and weighed in conjunction with the receipt of these facts.

For further documentation, please see the attached letter from our project partner, Micro Bird, which includes similar and additional concerns regarding the award or consideration of the LionA as a Type A school bus.

Similarly, we wish to express concerns with the proposed award for Type D, both with or without Chair Lifts. Within the bid requirements, in Addendum 3 the CEC has specifically required that applicants must “Certify the range of *each bus type*, and describe the process used to arrive at the range. This should include a description of the duty cycle used and why it is appropriate.”

To our knowledge, The Lion Electric Co, Inc. does not have a Type D school bus in production and therefore would not be able to substantiate the range for this type of bus. Weight and other parameters will cause variances in data from one bus type to another, which is why it is critical that each buy type be certified to prove the range meets the Energy Commission’s intended results of a minimum 100 mile range for Type C and D buses. It is concerning as well that, in appearance, the Lion Electric Co, Inc. bid a lower kWh battery solution that could potentially fall well below the intended 100 mile range with air conditioning and the other required specifications the Energy Commission has proposed. By so doing, school districts in need of 100 mile range may very well be required to purchase additional batteries through the Lion Electric Co to meet the range requirements that were intended through this procurement.

We would ask that the Energy Commission investigate what measures have been put in place to certify range on a Type D Lion school bus to ensure that school districts are receiving buses that meet the minimum requirements of the intended specifications for this award. Without having a product to test and certify, we feel this proposed award could have potentially detrimental consequences and instead promote the design and engineering of a product rather than allow for manufacturing to begin by July 1, 2019, as required in Section B to deliver within the Expected Timeframes for Bus Delivery.

For further documentation, please see the attached letter from our project partner, Blue Bird, which addresses similar and additional safety concerns in the design and construction of the Lion Electric Co’s Type D school bus.

Again we wish to express our appreciation for the opportunity to work together in any capacity towards the advances and deployments of electric technology within the school bus industry here in the state of California and trust that these concerns will be addressed in an appropriate manner.

Respectfully submitted,

John Landherr
President & CEO