

DOCKETED

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

June 7, 2019

Dear Mr. Dextraze,

On behalf of Blue Bird Corporation and our dealer body in California, A-Z Bus Sales we would like to thank you for the consideration on the recent California Energy Commission bid to establish bulk purchase prices for electric school buses.

We would like to specifically address the awardee for the Type D electric bus. Lion Bus has been awarded most categories based on the lower price they presented for the Type A, C and D buses. Although, it was not taken into consideration whether they currently manufacture or have the capability to manufacture these products. As of today, we have reason to believe there is no Type D Lion electric bus built, certified or tested for operation anywhere in North America. We would suggest further investigation by the CEC to determine if Lion has the capability to fulfill the orders that the CEC bid demands.

Some additional observations:

- We cannot say with any confidence that Lion will meet the below 'requirement for consideration' if the bus does not currently exist.
 - Bus must meet or exceed all applicable local, state, and federal laws, ordinances and requirements, including but not limited to all applicable safety and air quality regulations, and those reasonably anticipated.
- As far as the below 'requirement for consideration', will Lion have to show adequate manufacturing capability to build the Type D bus by July 1?
 - Bus provider must demonstrate adequate manufacturing capability to begin production of bulk bus orders by July 1, 2019 and deliver the proposed maximum number of buses within the Expected Timeframes for Bus Delivery. "Adequate manufacturing capability" means that no upgrades are required to deliver the number of buses proposed in the timeframe required.
- Lion has bid their 132Kwh battery pack which is stated will make 100 miles of range. This is only proven on the Type C. There is no data to prove that the much longer and heavier Type D bus will meet this requirement.
- The AC requirement on this bid will cause up to a 15-20% negative impact on battery capacity causing range to fall well below the 100-mile requirement.



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At Blue Bird we have been building buses since 1927. Our responsibility as a manufacturer of school buses is to offer the safest, cleanest most efficient buses on the road today. We have done so with various alternative fuels and now we are proud to do the same with our Type A, C and D electric buses. We would be doing a disservice to our customers and our passengers by encouraging them to buy a product that has never been built, crash tested or certified to federal safety standards.

If Lion would like to demonstrate they can or have built a Type D bus that meets all regulations and safety standards by July 1 then we would support that. Until then we would like to offer our Blue Bird product to the many districts that have applied for these funds and are expecting a safe, high quality bus that has been proven and is in operation in the state of California.

Respectfully we believe that for the above-mentioned reasons the Type D Lion bus should be investigated and if found non-compliant consequently removed from the CEC bid.

Please feel free to contact me with any questions.

Best Regards,

Kuba Szczypiorski
Director, Alternative Fuels