

DOCKETED

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June 26, 2019

Tomas Ortiz, Energy Analyst
California Energy Commission
1516 9th Street
Sacramento, CA 95815

RE: Issues with A-Z Bus Sales, BlueBird and MicroBird

Dear Mr. Ortiz,

The Lion Electric Co. would like to thank the California Energy Commission (CEC) for their work on GFO-18-604 and the opportunity to submit our proposal. The process was thorough and equitable for all bidders. We were pleased to provide extensive information about our company and proud to be one of the top-rated bidders in the technical review.

Lion was founded in 2008 with the intention to revolutionize the school bus industry. Lion focused on outreach to the school districts and major operators in student transportation industry to understand daily operation and business needs and identify key issues and opportunities. Based on the knowledge acquired, Lion began innovating safer, lighter, wider school bus built for the end-users. The Lion team quickly realized that the evolution of the yellow school bus was to an all-electric platform—providing operators with a more efficient, more economical, and lower maintenance option. Recognizing that existing diesel school bus fleets disproportionately expose students, who are sensitive receptors to toxic diesel emissions, and bus drivers with daily exposure to toxic air pollutants and associated health risks, Lion became the first manufacturer globally to dedicate our production to purpose-built, all zero-emission battery electric school buses.

Lion has deployed more than 200 electric school buses, with more than two million miles of service, including leading the world's largest deployment of zero-emission school buses, here in Sacramento, California. The company is the global leader in commercializing zero-emission school buses. We are excited for the opportunity to partner with the CEC to deliver more zero-emission school buses to the State of California.

Per your request, please see our responses to the letters submitted by A-Z Bus Sales, MicroBird Giradin, and Blue Bird. We addressed each letter separately, even though some of the items are similar.

A-Z Bus Sales

The Lion Electric Co. submitted signed applications with full understanding of the requirements of the solicitation. With more CHP certified school buses on the road than all other manufacturers combined, we lead the industry on experience with the CHP, FMVSS and DMV process for certifying electric vehicles more than any other provider. As with every vehicle we deliver, Lion stands behind its extensive history of having all designs meet and exceed safety inspection standards and certifications.

Type A Definition: A-Z referenced “national standards” for the Type A definition as mentioned by the National Standards for School Buses and Operations Conference of 1990. The “National Standards”



referenced specifically state that they are simply recommendations and are not binding in any way – in fact the State of California does not use these designations in the Title XIII that governs specifications for school buses. Additionally, the specific Type A definition only pertains to platforms that were available in 1990. The zero emission, battery electric vehicle specifications and bulk pricing requested GFO-18-604 were not considered by the conference in 1990 and no suggestions for electric specifications have been released to date.

Title XIII that governs specifications for school buses only identifies two types for school buses as Type I or Type II. Our buses fall under these categories appropriately and the scope of specifications outlined in GFO-18-604 fit within those categories as well, even though no such designation was required. Lion's zero-emission school buses are in full compliance with California's laws and vehicle codes.

The letter from A-Z references the removal of the LionA from the New York State Office of General Services. Unfortunately, this occurred because the same untrue and misleading complaint regarding the National Standards for School Buses and Operations Conference of 1990. We are working with the New York State Office of General Services to clear up the misunderstanding and fully expect to have the listing restored shortly.

The letter also references that applicants “certify the range of each bus type...” and that they “...do not have knowledge...” regarding our school bus bid under the Type D application. Lion leads the industry in vehicle range and exceeds the specifications listed in the solicitation. The Type D chassis is same as the powertrain system as our conventional school bus that has over 2,000,000 miles of in-service experience, therefore, certifying our range on school bus routes across North America.

MicroBird Girardin

As mentioned above, the Type A designation is not a legal definition for a school bus in the State of California. It is a suggested definition by a study that was completed in 1990 and does not apply to electric school specifications. Lion fully meets (and exceeds) the specifications listed under GFO-18-604 and the laws of the State of California.

Please see the description above regarding the reference to the New York State Office of General Services award. Please know that Lion was awarded this category in New York through a review of its specifications, performance, and capabilities. We are working with the New York State Office of General Services to clear up the misunderstanding and fully expect to have the listing restored shortly.

The letter also presents an unsubstantiated and unattributed quote from The Lion Electric Co. at a Canadian transportation conference. This has no bearing on an award based on the laws in the State of California.

Also, the reference to the tragic accident involving the Saskatchewan hockey team where the driver of a tractor trailer truck struck a coach bus at high speed from the side is inappropriate and unfortunate. The bus involved with the accident was not designed with the stringent specifications of a California school bus and a collision at that speed with a large, tractor trailer was the cause of the tragic results.



BlueBird

As part of our submission for GFO-18-604, we provided our manufacturing capabilities and ability to meet and exceed deadlines. In fact, we are proposing to deliver school buses within the Notice of Proposed Awards (NOPA) ahead of the CEC's required deadlines. We are glad to provide additional information, if helpful.

The letter states that BlueBird cannot say with confidence that a Lion, "Bus must meet or exceed all applicable local, state and federal laws, ordinances and requirements...". It is unclear to us what is meant by this statement, as Lion has met or exceeded all applicable local, state, and federal laws, ordinances, and requirements for our zero-emission school buses.

The Lion 132kwh battery pack is the most advanced in the school bus industry. As the first purpose-built zero-emission school bus manufacturer, our buses have more miles and hours of use than any other platform and we are proud that our stated range has been consistently proven on school bus routes throughout North America. The referenced 15%-20% range impact of Bluebird's air conditioning systems on their electric bus platform is not the industry standard – and is not the case for Lion's technology.

The Lion Electric Co. would like to thank the CEC for taking the time to conduct a complete and equitable review of applicants. We are proud of our successful track record of 200+ deployments across North America and look forward to working with CEC to deploy more zero-emission school buses in communities throughout California.

Please feel free to contact me directly with any questions.

Sincerely,

Nate Baguio
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The Lion Electric Co.
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