

**DOCKETED**

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*Comment Received From: Proterra  
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**Proterra Comments on Updated Investment Plan**

*Additional submitted attachment is included below.*



August 9, 2019

California Energy Commission  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

RE: 2019-2020 Investment Plan Update for the Clean Transportation Program

Dear CEC Commissioners and Staff,

Thank you for the opportunity to provide comments on CEC's 2019-202 Investment Plan Update for the Clean Transportation Program, formerly the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP).

Proterra designs and manufactures an industry-leading fuel-efficient battery-electric bus and the infrastructure and chargers to support bus deployments. Our buses feature on-route, fast-charge technology perfect for circulator routes at airports and in city centers, as well as an extended range depot charging option that meet the needs of nearly all transit routes on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions. Proterra's headquarters are located in Burlingame, California and it has expanded manufacturing of buses to the City of Industry, California and battery system and charger design and manufacturing to Burlingame. Proterra Energy™ fleet services offers a turnkey approach to delivering a complete solution for heavy-duty electric fleets; including chargers, infrastructure design build, operations, maintenance and energy management - allowing future zero-emission buses and infrastructure deployed in California to be designed and manufactured by Californians and supported by California supply chains.

Proterra supports focusing the limited investment on zero-emission technologies to help the state achieve its robust greenhouse gas reduction and zero-emission vehicle and infrastructure deployment goals. There is a need to focus funding on technologies that will help fleet operators achieve zero-emission requirements, especially with the recent approval of the Innovative Clean Transit initiative, the Airport Shuttle Bus Regulation, and the anticipated development of an Advanced Clean Trucks rule by the Air Resources Board. In addition, low-NOx and other non-zero technologies will continue to receive incentives through the portfolio of Air Resources Board's (ARB) investments, including the Carl Moyer program, Volkswagen Settlement, Low Carbon Fuel Standard, and others.

Proterra also supports the proposed allocation of \$30 million for medium- and heavy-duty zero-emission vehicles and infrastructure. While medium- and heavy-duty vehicles account for a small share of California's rolling stock, they are responsible for 23% of on-road greenhouse gas emissions in the state and nearly 60% of NOx and 52% of PM2.5 emissions from on-road transportation in California. For these reasons, medium- and heavy-duty vehicles represent a



significant opportunity to reduce greenhouse gas emissions and criteria emissions. Focusing on medium- and heavy-duty vehicles and infrastructure will complement other state programs, including those at ARB, to support needed infrastructure deployment, helping to accelerate the deployment of medium- and heavy-duty zero-emission vehicles.

Thank you for the opportunity to provide comments on the development of the 2019-202 Investment Plan Update for the Clean Transportation Program. We look forward to continuing to work with staff to help implement this important program.

Sincerely,

*Kent Leacock*

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Proterra Inc