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August 9, 2019

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 18-ALT-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Docket #18-ALT-01: Comments in support of the 2019-2020 Investment Plan Update for the Clean Transportation Program

Dear Commissioner Monahan,

On behalf of SunLine Transit Agency, I write today to provide formal comments on the proposed 2019-2020 Investment Plan Update for the Clean Transportation Program. We greatly appreciate Energy Commission staff taking the time to host a public advisory committee meeting for the Investment Plan. We are excited by the inclusion of a \$2.5 million allocation for workforce training as we believe training our workforce is the best way to ensure investments in new, zero emission technologies are maximized and not stranded.

As the first adopter of zero emission technology in the transit sector in California over 20 years ago, SunLine has come to fully understand that workforce training on zero emission technology is imperative for a successful transition to a zero emission fleet. We had no training center, no other transit to look to for advice. We had to learn by trial and error and now we dedicate ourselves to ensuring other transit agencies make a smooth transition to zero emission.

Our commitment to workforce training has driven us to establish a first-of-its-kind, zero emission specific workforce training program. Approximately \$3 million to date have been granted by the Federal Transit Administration (FTA) to fund Sunline to build and develop a facility and training materials for the West Coast Center of Excellence in Zero Emission Technology. With that money, we've partnered with experts in zero emission bus maintenance, planning, acquisition, operation and executive leadership to build custom-tailored courses for California transit agencies to learn how they can best implement a zero emission bus rollout.

Unfortunately, there are currently no FTA grants that can continue this one-of-kind innovative workforce training program. We now look to the State of California to help us assist the transit systems who serve over 1.2 billion Californians per year. The West Coast Center of Excellence in Zero Emission Technology itself is now fully operational – our first two workshops are complete and

our first personally tailored training will be held September 17th at Santa Cruz Metropolitan Transit District. However, the cost of attendance for recipient transit agencies and the cost of conducting training borne by the West Coast Center of Excellence in Zero Emission Technology itself, while minimal by many standards, will prove insurmountable to SunLine Transit and many recipient transit agencies. For this we look to the State.

With the ARB's Innovative Clean Transit Rule now in its implementation stage, more and more transits will be deploying zero emission technology. It is Sunline's hope that the West Coast Center of Excellence in Zero Emission Technology will help transits deploy zero emission buses smoothly, avoiding hard lessons learned by early adopters, so that taxpayer, fare-payer and State dollars are maximized in these efforts and not squandered needlessly due to an untrained or undertrained workforce.

For these reasons, we fully support the allocation of \$2.5 million of the 2019-2020 Investment Plan Update for the Clean Transportation Program to workforce training and hope to work closely with CEC staff on the implementation of the Investment Plan to ensure those funds are solicited in a way that prioritizes workforce training programs like ours, which compliment ongoing regulations like the Innovative Clean Transit Rule.

We thank you for the opportunity to submit these written comments and feedback. Please keep SunLine Transit Agency and the West Coast Center of Excellence in Zero Emission Technology in mind if we can provide any data, information or otherwise be helpful as you move forward with the 2019-2020 Investment Plan for the Clean Transportation Program or any other agency priorities.

Finally, SunLine Transit Agency fully supports the transition in program naming from the Advanced Renewable Fuel and Vehicle Technology Program to the Clean Transportation Program.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lauren Skiver". The signature is stylized with a large initial "L" and "S".

Lauren Skiver
CEO/General Manager