

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
<b>TN #:</b>	230523
<b>Document Title:</b>	Foothill Transit Comments - To Address Solicitation Concepts for Zero-Emission Buses and Supporting Infrastructure Deployment
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Foothill Transit
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/6/2019 4:05:03 PM
<b>Docketed Date:</b>	11/6/2019

*Comment Received From: Foothill Transit  
Submitted On: 11/6/2019  
Docket Number: 19-TRAN-02*

**Foothill Transit Comments re 19-TRAN-02**

*Additional submitted attachment is included below.*



**Foothill Transit**  
Going Good Places

November 6, 2019

California Energy Commission  
1515 Ninth Street  
Sacramento, CA 95814

RE: Docket No. 19-TRAN-02.

Dear California Energy Commission Members:

On behalf of Foothill Transit, I submit these comments to address solicitation concepts for zero-emission buses (ZEBs) and supporting infrastructure deployment.

Foothill Transit is the primary public transit provider in the Pomona and San Gabriel Valleys of eastern Los Angeles County. Since our first deployment of ZEBs in 2010, Foothill Transit has been a leader in zero-emission efforts. Today, we have 33 battery electric buses in operation and two more battery electric double deck buses slated to start service in Spring 2020. Although Foothill Transit is at the forefront of the state-wide electrification efforts, we are still learning a lot about ZEB technologies, and specifically how to scale our fleet. The most daunting challenge is the high cost of ZEBs and infrastructure, and the cost and complexity of electric utility rates for ZEB charging.

Foothill Transit relied heavily on programs such as Hydrogen and Battery Electric Vehicle Incentive Program (HVIP) to procure existing electric buses. On October 24, 2019, CARB voted to exclude infrastructure costs from HVIP qualifications. This funding gap will make it more difficult for transit agencies to comply with CARB's Innovative Clean Transit (ICT) ruling, which mandates that transit agencies must transition to zero-emission bus fleets by 2040.

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The purpose of this letter is to address Concepts 2, 3, and 5 set forth at the October 25, 2019 Staff Workshop on MD/HD Zero Emission Vehicle (ZEV) and Infrastructure Deployment, where Foothill Transit was present and provided oral comments. I will omit Concept 1 and Concept 4, as they do not apply to transit agencies.

Concept #2: Transit and Fleets, Capital Expense Assistance for ZEV Infrastructure Deployment.

As you know, on October 24, 2019, CARB voted to exclude infrastructure buildout from HVIP qualifications. This unfortunate decision places a significant burden on many transit agencies, including Foothill Transit.

Infrastructure requires a significant investment in the fleet electrification process. In 2018, Foothill Transit commissioned consulting firm Burns & McDonnell to analyze our fleet and develop a roll-out plan. The resulting report, which was completed in September 2019, indicates that it will cost \$120 million to install charging infrastructure for our 368-bus fleet.

While we are fortunate to benefit from Southern California Edison's Charge Ready Program, this only subsidizes a portion of the infrastructure costs. Burns & McDonnell expect that after rebates, the incremental cost to transition from CNG to BEB is estimated to be around \$6.3 million per year.

For these reasons it is imperative that the CEC set aside technology-neutral funding for ZEV infrastructure deployment and close the funding gap that transit agencies now face with regards to high infrastructure costs. Without your agency's support, transit agencies will have a difficult time complying with the ICT regulation that calls for transit agencies to transition to zero-emission fleets by 2040.

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In this respect, Foothill Transit recommends that CEC staff work closely with CARB staff to determine how the agencies can complement each other and ensure that funding gaps are closed. This is especially important for transit agencies that are required to transition to zero-emission fleets by 2040 without any additional revenue source. Coordination can either take the form of periodic meetings between the agencies' staff, or public workshops that allow stakeholders to provide valuable input. Regardless of the forum, we ask that transit agencies receive priority for this funding.

Concept #3: ZEV Blueprints for MD/HD Vehicles and Infrastructure (Including Small Seaports and DACs)

Foothill Transit is a strong believer in planning ahead and preparing for the future as well as possible. As mentioned above, Foothill Transit commissioned Burns & McDonnell to determine a roll-out plan for large-scale ZEB deployment. The report that was produced by Burns & McDonnell provided helpful insight into the costs and logistics associated with electrifying our fleet, and helped us identify expected, as well as unexpected challenges.

We highly recommend that CEC fund blueprint projects. Specifically, we encourage the CEC to prioritize public transit agencies that are subject to ICT's 2040 zero-emission bus fleet regulation. We recommend that CEC begin this Concept before Concepts 1 and 2, so that time and money is not wasted on failed or inefficient projects. Alternatively, we suggest that Concept 3 be incorporated into Concepts 1 and 2.

Concept #5: Miscellaneous - Long Haul, and Innovative Applications: Electric Infrastructure for Other Applications; Long-Haul Truck Demonstrations and Infrastructure Needs; Technology Demonstration of New, Innovative Charging Equipment



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Foothill Transit supports investments in innovative charging and refueling solutions for transit agencies that struggle with many challenges, such as cost and complexity of electric utility costs, limited space in bus depots for additional electric buses and supporting charging infrastructure, and charging logistics.

Foothill Transit also encourages the CEC to invest in innovative applications that reduce carbon emissions from alternative fuel generation before it even gets to transit agencies. This way, we can take the environmental effort one step further and pride ourselves in operating true zero-emission bus fleets.

Regarding grant structuring, we encourage the CEC to restructure the funds similar to CALeVIP, which is implemented by the Center for Sustainable Energy. This will allow for a more streamlined process for grant applications, thus increasing efficiency. It would also create an easier contact point for stakeholders who want to stay connected and receive and share information with the agency. Regardless of the solicitation process, Foothill Transit respectfully urges the Commission to prioritize funding to transit agencies, as they are all bound by the ICT mandate. For example, a competitive solicitation process should provide preferential scoring for transit agencies, and a first-come/first-serve process should include set-aside funding for transit agencies.

We thank you for your work on this important effort and appreciate your attention to this letter. If you have any questions or concerns, please do not hesitate to reach out. We look forward to continue working with the California Energy Commission.

Sincerely,



Doran J. Barnes  
Executive Director

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