

DOCKETED

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Lion comments on Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Additional submitted attachment is included below.



November 8, 2019

California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Docket No. 19-TRAN-02 – Concepts for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear California Energy Commission Commissioners and Staff,

The Lion Electric Co. (Lion) appreciates the opportunity to provide comments on California Energy Commission's (CEC) concepts for medium- and heavy-duty zero-emission vehicles and infrastructure as part of the CEC's Clean Transportation Program.

Lion is a leading Original Equipment Manufacturer of all-electric vehicles, including zero-emission Type A, C and D school buses, zero-emission trucks, and zero-emission shuttle buses, with deployments in California, New York, Massachusetts, and other states across the nation. Today, there are currently over 200 Lion electric school buses in operation in North America with over 2.5 million miles of service carrying kids to school every day safely for the last 3 years. Lion appreciates the strong partnership with the Energy Commission on the School Bus Replacement Program and is looking forward to deploying hundreds more zero-emission school buses throughout the state. Recently, Department of General Services (DGS) selected the Lion8 (Class 8) Tractor and the Lion8 Refuse Truck for the Medium and Heavy Duty Zero Emission & Plug-In Hybrid Vehicle California State Contract. Both vehicles offer up to 250 miles (or 1,200 homes to collect trash) on a single charge, as well as 80% energy and 60% operational and maintenance cost savings.

Lion supports staff's proposal to fund infrastructure for medium- and heavy-duty infrastructure and vehicles. Our specific comments include:

1. Within the proposed concept #2 for transit and truck fleets, we recommend expanding eligible fleets to include both school buses/infrastructure and shuttle buses/infrastructure. These fleets perform similar functions to transit, and provide zero-emission miles for all, directly benefitting disadvantaged communities. These fleets, especially school districts, also tend to be less financially equipped to invest in zero-emission technologies and infrastructure. Providing them with the resources they require to meet California's long-term air quality goals will allow them to transition to zero-emission fleets in a more timely manner. There is also a need to focus funding on technologies that will help fleets achieve state requirements, including the Airport Shuttle Bus Regulation and proposed Advanced Clean Trucks rule.





2. Lion also supports prioritizing funding for concepts #1 and #2 in order to receive the greatest near-term emission reductions and health benefits. While planning and electrification blueprints are helpful for some fleets, many are already deploying zero-emission vehicles and infrastructure, and are ready to deploy additional vehicles and chargers without lengthy planning programs. By prioritizing funding for those fleets most ready to deploy zero-emission vehicles, the CEC will accelerate the deployment of these vehicles and realize the positive effects of the Clean Transportation Program in the most efficient way possible.

3. Finally, within proposed concept #5, Lion supports including funding for pre-commercial vehicle demonstrations. While some heavy-duty vehicles are fully commercial, such as school and transit buses, there are emerging technologies and other vehicle types that will need to be demonstrated on pilot levels. Funding for demonstrations of pre-commercial vehicles is especially helpful when such funding may not be as easily accessible as funding for fully commercialized vehicle types. Including this category of funding serves as a necessary complement to infrastructure projects; where there is funding for infrastructure, funding for vehicles is a logical counterpart.

Lion appreciates the opportunity to provide comments on concepts for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure. We look forward to continuing to work together to help implement the programs and reducing greenhouse gas and criteria pollutant emissions in communities across California.

Sincerely,

Nate Baguio
Vice President of Sales

