

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
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*Comment Received From: Mike Hursh*  
*Submitted On: 1/9/2020*  
*Docket Number: 19-TRAN-02*

**Letter to Ester Odufuwa**

*Additional submitted attachment is included below.*



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Alameda-Contra Costa Transit District

Michael Hursh, General Manager

January 7, 2020

Ester Odufuwa  
Energy Commission Specialist 1, Freight and Transit Unit  
Advanced Fuels and Vehicle Technologies Office  
Fuels and Transportation Division  
California Energy Commission  
1516 Ninth Street  
Sacramento, California 95814-5512

**Re.: Docket #19-TRAN-02 Medium and Heavy-Duty Zero-Emission Vehicles and Infrastructure  
- Support For 100 Bus Initiative**

Dear Ms. Odufuwa:

I write on behalf of the Alameda-Contra Costa Transit District (“AC Transit”) to support the 100-Bus Initiative created by the Center for Transportation and the Environment (“CTE”) to coordinate with various transit agencies to facilitate a combined purchase of 100 or more Fuel Cell Electric Buses (“FCEBs”). The intent of this initiative is to reduce the unit cost of FCEBs and, through the increased number of agencies using hydrogen, attract new suppliers into the hydrogen market, increasing competition and, hopefully, reducing the cost of hydrogen. The cost of hydrogen is an impediment to the broader adoption of FCEBs.

The California Air Resources Board (“CARB”) has adopted the Innovative Clean Transit Regulation. To achieve the goals set forth by that regulation to reduce greenhouse gases and local criteria pollutants, California needs multiple options to successfully transition its fleet to zero emissions.

We strongly support funding programs that will assist us and other California transit agencies in procuring ZEBs and supporting fueling and maintenance facilities. Thanks to prior CEC, CARB, and federal funding we have sufficient fueling and maintenance facilities for our next increment of ZEBs; that is not the case for California agencies seeking to begin to operate ZEBs. The California Public Utilities Commission (“CPUC”) has authorized California's Investor Owned Utilities (“IOUs”) to finance BEB infrastructure with ratepayer funds, but there is no such funding for FCEB infrastructure.

The CEC is preparing for the release of a \$47.5 million Grant Funding Opportunity (“GFC”) during the first or second quarter of 2020, under CEC's “Medium and Heavy-Duty Zero-Emission Vehicles and Infrastructure” program. AC Transit recommends that this GFO allow for competitive applications to build heavy-duty hydrogen fueling stations and upgrade maintenance facilities to support the deployment of FCEBs. (AC Transit has upgraded four maintenance bays in two of our yards to accommodate FCEBs and can provide data as to the costs of those upgrades.) The 100-Bus Initiative holds the promise of substantially reducing the cost of FCEBs and possibility reducing the cost of hydrogen, but without funding to support the construction of supporting facilities we will not realize the emergence of a vibrant commercial market for this critically important ZEB technology and its fuel.

AC Transit is aware of, and has benefited from, CTEs extensive work on zero-emission and freight-related demonstration and deployment projects in California and their successful record of obtaining numerous grants from the federal government, CARB, and CEC for these types of projects. We believe our support and commitment to the 100-Bus Initiative will indicate the viability of a program such as this and will significantly improve the availability of heavy-duty vehicles in California. We look forward to working with you on this exciting endeavor.

Sincerely,



Michael Hursh  
General Manager