

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
<b>TN #:</b>	232267
<b>Document Title:</b>	North County Transit District Support Letter for the 100-Bus Initiative
<b>Description:</b>	N/A
<b>Filer:</b>	Christina Cordero
<b>Organization:</b>	North County Transit District
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January 22, 2020

Ms. Esther Odufuwa  
Energy Commission Specialist I, Freight and Transit Unit  
Advanced Fuels and Vehicle Technologies Office  
Fuels and Transportation Division  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re: Docket No. 19-TRAN-02 Medium and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear Ms. Odufuwa:

I am writing on behalf of the North County Transit District (NCTD) to express our support for the 100-Bus Initiative created by the Center for Transportation and the Environment (CTE) to coordinate with other transit agencies 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 to further the goals of reducing greenhouse gas emissions and local criteria pollutants. The California Resources Board (CARB) has adopted the Innovative Clean Transit Regulation, and to achieve the goals set forth by that regulation, we will need multiple technology options to successfully transition our fleet to zero emissions.

NCTD provides public transit in North San Diego County, from the Pacific Ocean east to Ramona, and from the Orange County border south to Del Mar, with connections extending to downtown San Diego. NCTD's fixed route fleet consists of 152 full size low floor buses (143 Compressed Natural Gas (CNG) and 9 Diesel). NCTD carries an approximate 10.3 million annual passengers across all modes, and 6.4 million annual passengers on fixed route bus service alone. We strongly support funding programs that will assist us and other California transit agencies in procuring Zero-Emission Buses (ZEBs) and supporting fueling and maintenance facilities. While we have an interest in procuring FCEBs, not all agencies have the necessary infrastructure to support the deployment of these vehicles.

The California Energy Commission (CEC) is preparing for the release of a \$47.5 million Grant Funding Opportunity (GFO) during the first or second quarter of 2020, under CEC's "Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure" program. NCTD 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. The 100-Bus Initiative holds the promise to substantially reduce the cost of FCEBs, but without funding to support the construction of supporting facilities we will not realize the emergence of a commercial market for this critically important ZEB technology.

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NCTD is aware of CTE's extensive work on zero-emission bus 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 clean heavy-duty vehicles in California. We look forward to working with you on this exciting endeavor.

Sincerely,



Matthew O. Tucker  
Executive Director, NCTD

cc: Damon Blythe, Chief Operations Officer – Service Planning and Bus  
Operations, NCTD