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Lion Comments on Clean Transportation Program Investment Plan

Additional submitted attachment is included below.



March 16, 2020

California Energy Commission
1516 9th Street
Sacramento, CA 95815

RE: 2020-2023 Investment Plan Update for the Clean Transportation Program

Dear Commissioners and Staff,

The Lion Electric Co. appreciates the opportunity to provide comments on the Energy Commission's 2020-2023 Investment Plan Update for the Clean Transportation Program. Lion strongly supports the Clean Transportation Program and continued efforts to spur deployment of zero-emission vehicles and infrastructure to reduce harmful GHG and criteria pollutant emissions.

Lion is a leading Original Equipment Manufacturer of all-electric vehicles, including zero-emission Type A and C school buses and zero-emission trucks and shuttle buses, with deployments in California, New York, Massachusetts, and other states across the nation. Today, there are currently over 300 Lion electric school buses in operation in North America that have been carrying kids to school every day safely for the last 3 years, with over 6 million miles of service provided.

Lion supports the proposed \$10 million allocation for manufacturing and we recommend including this in the FY 2020-21 investments rather than the following years. Lion recently announced the opening of its new Experience Center in Sacramento and its first in Los Angeles in 2020. These centers are designed to help educate fleets on electrification and provide teaching space available for school districts, fleet operators and agencies to learn about EV capabilities, charging, and experience vehicle demos. Lion hopes to expand its operations in California to include the manufacturing of electric trucks and buses, and near-term state investment in this area will help support economic development and workforce training in this sector.

Lion strongly supports the multi-year goal to invest in medium- and heavy-duty infrastructure and vehicles. This will help additional fleet operators to transition to zero-emission faster. Within this funding, Lion recommends inclusion of school buses as eligible fleets. Significant funding has been dedicated to zero-emission school bus technology to date, but there is still substantial need to clean up one of the oldest and dirtiest statewide school bus fleets in the nation. Additionally, we support increasing funding for medium- and heavy-duty vehicles and infrastructure for FY 2020-2021 to its previous \$30 million level. These vehicles have different levels of energy use as compared to light-duty and providing infrastructure for larger fleets can be more challenging. Continued investment in the short term is needed to support commercialization for medium- and heavy-duty electric vehicles.

Additionally, while it is not a part of the Clean Transportation program, Lion strongly supports the School Bus Replacement Program and thanks the CEC staff for its work to date on implementation. School buses are the largest segment of mass transit in the United States and, unfortunately, are among the oldest and dirtiest fleets on the road. School children are sensitive receptors and face elevated health risks from exposures to toxic air contaminants from diesel emissions while riding in and being near California's existing fleet of dirty diesel school buses, which disproportionately expose young people to toxic air contaminants and associated health risks. With demand from school districts expected to greatly exceed available funding, we support further investment for this program to help improve California's school bus





fleet composition, reduce emissions from the transportation sector, improve air quality, and help reach our 2050 climate targets.

Lion appreciates the development of the proposed 2020-2023 Investment Plan Update for the Clean Transportation Program and looks forward to working with the Energy Commission to implement this program.

Sincerely,

Nate Baguio
Vice President of Sales

