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Heard about Work Shop: VTA is signed up to get CEC notification

April 21, 2020

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Feedback and comments from *Zero-Emission Transit Fleet Infrastructure Deployment*

Dear Ms. Odufuwa,

VTA thanks the Commission for providing this opportunity to provide comments about the *Zero-Emission Transit Fleet Infrastructure Deployment* webinar and future Solicitation *Concept for Medium-and Heavy-Duty Zero-Emission Transit Fleet Infrastructure Deployment*.

VTA is committed to fully transition its 470-bus fleet to zero-emission ahead of the 2040 California Air Resources Board mandate. VTA operates 70 bus routes and light rail lines, supplying critical transportation to municipalities across Santa Clara County, California.

VTA is interested in the proposed solicitation concept for Zero-Emission Transit Infrastructure Deployment. This concept targets 1 - 2 large-scale deployments of 50 or 100 buses and proposes up to \$10 - \$20 million in funding for either electric or hydrogen infrastructure. My comments are as follows:

- Based on the current state of electric vehicle technology (primarily range but also vehicle quality and availability) and the cost of hydrogen and hydrogen vehicles, many transit agencies (including VTA) are hesitant to commit to one path at this time. Focusing on smaller deployments of 25 - 50 vehicles and scalable solutions that would allow agencies the flexibility to switch paths or to pursue multiple paths if necessary, would be more practical and beneficial.
- As a medium to large transit agency, VTA has three bus yards with 100-150 buses each. Even with such large sites, we are concerned about the availability of space for infrastructure to support a full fleet of zero emission buses. These issues need to be worked out before investing in building out the infrastructure

to support a full fleet of zero emission buses. As a result, we support focusing on smaller deployments of 25 - 50 vehicles and scalable solutions.

- Strongly support the inclusion of managed charging, renewables, storage, and microgrids/resiliency in all zero-emission transit infrastructure deployments.
- We would request that transit agencies should be allowed to count utility incentives for behind-the-meter infrastructure and rebates for charging equipment toward the 50% match requirement.
- Recommend allowing transit agencies to leverage future LCFS revenues toward their 50% match requirement.
- VTA has a bus yard property line that is directly adjacent to a DAC but not technically in a DAC. VTA recommends that the DAC criteria be revised to include sites that are in or adjacent to a DAC.
- Due to the current lead time in getting the utility companies such as PG&E to deliver site power infrastructure, the March 2027 deadline may be challenging to meet. Focusing on smaller deployments of 25 - 50 vehicles reduces the incremental power requirement from the Grid during fleet charging.
- Deploying a large number of Zero Emission Buses (ZEB) with 12 months plus lead time from order acceptance to delivery could also make deploying a large fleet of ZEB's extremely challenging by the March 2027 deadline.
- A large ZEB fleet must have resiliency in order to carry out our mission during an emergency. The solicitation should strongly consider resiliency either as a requirement or as a criteria for the award. An EV bus fleet without an island-capable power supply could be disastrous for the local community during power outages which are expected to increase both in frequency and duration.

If you should have any questions regarding our comments, please contact me directly at 408-348-4309 or via email at gary.miskell@vta.org.

Respectfully,



Gary P. Miskell
Chief Innovation and Technology Officer CITO