

DOCKETED

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Proterra Comments on Draft ZEV Transit Infrastructure Concept

Additional submitted attachment is included below.



April 24, 2020

California Energy Commission
1516 9th Street
Sacramento, CA 95815

RE: Zero-Emission Transit Fleet Infrastructure Deployment Draft Solicitation Concept

Dear Commissioners and Staff,

Thank you for the opportunity to provide comments on the proposed Zero-Emission Transit Fleet Infrastructure Deployment Draft Solicitation Concept. Proterra strongly supports efforts to deploy comprehensive zero-emission infrastructure projects at California transit agencies.

Proterra designs and manufactures the most efficient vehicle in its class with the greatest range per kWh of energy storage. Proterra's Catalyst electric bus achieves up to 25 MPGe compared to a diesel bus and can deliver nearly twice the horsepower and five times better fuel efficiency than a standard diesel vehicle. Proterra electric buses have zero tailpipe emissions or pollutants, eliminating about 230,000 pounds of CO₂ emissions annually for every diesel vehicle replaced. We moved our Corporate Headquarters to Burlingame, California from the East Coast and expanded manufacturing to the City of Industry, California —allowing future zero-emission buses deployed in California to be designed and manufactured by Californians and supported by California supply chains.

Proterra strongly supports the Energy Commissions efforts to provide \$20 million for transit agencies for make-ready zero-emission vehicle charging infrastructure to support the roll-out of heavy-duty transit bus fleets. Within this funding, Proterra's specific comments include:

1. We support expanding categories based on the type of fleet conversion and the number of zero-emission buses. Specifically, we support including a category for conversion of an entire bus depot for at least 30 buses. Electrifying an entire depot will achieve the same goal of demonstrating a large-scale infrastructure deployment and serve as a model for other transit agencies seeking to deploy zero-emission infrastructure. In addition, transit agencies typically implement projects by bus depot, rather than the entire fleet.

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2. We support reducing the maximum award based on the Applicant's type of fleet and number of buses to be supported by the infrastructure to allow more projects to be funded. Specifically, we encourage the Energy Commission to fund infrastructure for 3-4 large-scale transit projects. We also respectfully request the Energy Commission consider funding at least one project for each type of zero-emission technology. This will provide further data at multiple transit agencies with various zero-emission technologies that will improve replicability to support the rollout of zero-emission transit bus fleets.
3. We support the match funding requirement and respectfully request that extra points be awarded for projects that provide greater than 50% match share. In addition, we respectfully request the inclusion of third-party financing as eligible match funding. Proterra is seeing increased interest and use of public-private partnership-type financing for electric bus infrastructure projects that allow the cost of chargers and infrastructure to be paid for as it is used as part of the electricity cost. This type of approach would allow the CEC to help get a larger project built with a small amount of grant funding and would demonstrate a very replicable model for all transit agencies in California.
4. To help ensure project success, we respectfully request requiring applicants to provide a plan for the deployment of the zero-emission buses to compliment the infrastructure by 2027. We also suggest that if projects can deploy the infrastructure and zero-emission buses earlier than 2027, that this be a consideration for additional points, as this will help provide examples to other transit agencies of how to effectively deploy large charging infrastructure projects earlier so others can follow their example sooner and provide more robust data and lessons learned with the deployment of both the vehicles and the infrastructure.
5. We respectfully request that the Energy Commission include language in the Eligible Applicants to clarify the ability of agencies to partner with third parties to implement the projects. The 2020 California Transit and Intercity Rail Program (TIRCP) includes a provision that 'Private companies may partner with eligible applicants to propose and deliver projects.', and a similar provision in the Federal Transit Administration Low or No Emission Vehicle Program to allow transit agencies to accelerate the deployment of electric vehicles and infrastructure, utilize unique financing approaches, and use innovative project delivery models. The inclusion of this language in the Zero-emission Transit Fleet Infrastructure Deployment program will have similar benefits for transit agencies across California.

Thank you for the opportunity to provide comments on the development of the Zero-Emission Transit Fleet Infrastructure Deployment Draft Solicitation Concept as part of

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the Clean Transportation Program. We look forward to continuing to work together to help carry out the goals of the program.

Sincerely,

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