

**DOCKETED**

<b>Docket Number:</b>	19-TRAN-02
<b>Project Title:</b>	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
<b>TN #:</b>	232838
<b>Document Title:</b>	Kevin Maggay Comments - SoCalGas Comments Zero-Emission Transit Fleet Infrastructure Deployment
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Kevin Maggay
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	4/24/2020 1:56:57 PM
<b>Docketed Date:</b>	4/24/2020

*Comment Received From: Kevin Maggay*  
*Submitted On: 4/24/2020*  
*Docket Number: 19-TRAN-02*

**SoCalGas Comments Zero-Emission Transit Fleet Infrastructure Deployment**

*Additional submitted attachment is included below.*



**Kevin Maggay**  
Energy and Environmental Affairs

555 W. 5<sup>th</sup> Street  
17<sup>th</sup> Floor  
Los Angeles, CA 90013

(213) 244-8192  
kmaggay@socalgas.com

April 22, 2020

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Subject: Comments on the Draft Concept Document ZEV Transit Fleets, Docket # 19-TRAN-02**

Southern California Gas Company (SoCalGas) appreciates the opportunity to comment on the California Energy Commission (CEC) Draft Concept Document for Zero Emission Vehicle (ZEV) Transit Fleets (Docket # 19-TRAN-02). To potentially improve the Draft Concept Document, SoCalGas would like to offer the following comments for consideration.

**CEC Should Commit to Funding Multiple Projects of Different Sizes Under This Solicitation**

The Draft Concept Document states that one or two projects may be awarded funds and that the maximum amount of funding that can be awarded to a project is the entire solicitation total of \$20 million. Per the California Air Resources Board's Innovative Clean Transit Rule, all transit agencies in the state will be required to transition to zero emission buses by 2040. With all transit agencies required to move to ZEVs, funding multiple projects, particularly of different sized transit agencies serving diverse geographic regions and populations would provide multiple benefits. First, funding multiple projects would be more equitable to spread the funding out to multiple agencies, rather than potentially one awardee. Second, funding multiple types of transit agencies will provide more real-world knowledge for agencies, especially smaller rural agencies, that are not yet ready to transition but would benefit from the lessons learned from early actors. Not all transit agencies serve the same routes, demands, geographies, and populations and demonstrating ZEVs among a diverse set of transit agencies would assist in the transition to ZEVs. Lastly, it would encourage transit agencies to accelerate their transition.

**CEC Should Set Aside Funding for Hydrogen Infrastructure**

Hydrogen powered buses will play an integral role in meeting the state's goal of transitioning all transit buses to ZEVs due to the increased range and speed of fueling advantages it has over

battery electric technologies. Many transit agencies, particularly those serving rural communities, have fewer buses and travel more miles than urban transit agencies. Hydrogen-powered buses can fuel in minutes and meet the extended range requirements demanded by many transit agencies. Setting aside a portion of the funding for hydrogen would show commitment and investment in a portfolio of technologies that will give transit operators the flexibility and options they need to meet the requirements of the CARB ICT regulation.

Thank you again for the opportunity to comment and we look forward to the Infrastructure Solicitation being released.

Sincerely,

A handwritten signature in black ink, appearing to read 'KM' or similar initials, written in a cursive style.

Kevin Maggay  
Energy and Environmental Affairs