

DOCKETED

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GNA comments on ZEV Transit Fleet draft solicitation

Additional submitted attachment is included below.

April 24, 2020

Esther Odufuwa
California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Comments on Zero-Emission Transit Fleet Solicitation Concept under Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear Ms. Odufuwa,

Thank you for the opportunity to provide comments on the draft solicitation concepts for the Medium- and Heavy-Duty (MD/HD) Zero-Emission Vehicles and Infrastructure category. We appreciate all of the Energy Commission's effort to support the advancement of the zero-emission vehicle (ZEV) market in order to reduce vehicle emissions and improve air quality. We respectfully request that the Commission consider the following questions and comments while finalizing the development of the draft solicitation concepts:

- We strongly encourage the Energy Commission to add a fourth category to this solicitation for smaller fleets (at least 50 buses) with a shared major corridor/shared use of infrastructure. This would provide a critical opportunity for smaller transit agencies to team-up and share resources in order to deploy zero-emission transit services in underserved and disadvantaged communities.
- We recommend that the Energy Commission consider prioritizing/targeting that one of the two potential awards be a project in **non** investor-owned-utility (IOU) service territory. Investments in non-IOU territory are critical to support the deployment of zero-emission technologies in communities without access to hundreds of millions of dollars in additional IOU program funding and incentives.
- We strongly recommend that the Energy Commission increase the total funding amount for this solicitation, as we do not believe that \$10-20 Million is enough to fully fund infrastructure to support 50-100+ transit bus fleets. Increasing the total funding amount is critical to ensuring that transit agencies in non-IOU territory also have an opportunity to successfully deploy zero-emission transit fleets without additional funding from IOU programs/incentives.
- We respectfully request that the Energy Commission clarify how they will view certain entities, such as some City Ports, who oversee their own utilities but still obtain some services from an IOU. We recommend that the designation of being 'in an IOU or non-IOU service territory' be based on access to IOU electrification programs/incentives.

Thank you very much for your consideration. We look forward to the release of the solicitation and seeing the critical planning efforts that are supported by this funding. Please don't hesitate to reach out with any questions or clarifications.

All the best,

A handwritten signature in black ink, appearing to read 'Eleni Petrow', written in a cursive style.

Eleni Petrow

Program Manager, Public Affairs, Policy & Grants

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