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The Lion Electric Co comments on proposed changes to 2020-2023 Clean Transportation Funding Plan

Additional submitted attachment is included below.

LION ELECTRIC

July 6, 2020

The Lion Electric Co.
4522 Parker Ave, Suite 350
McClellan Park, CA 95652

California Energy Commission
1516 9th Street
Sacramento, CA 95815

RE: The Lion Electric Co. Comments on Proposed Changes to the 2020-2023 Investment Plan for the Clean Transportation Program

Dear Commissioners and Staff,

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

Lion is a leading Original Equipment Manufacturer of all-electric vehicles, including zero-emission school buses, 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 three years, with over six million miles of service provided. Over 100 of our zero-emission school buses have been deployed in California alone.

Lion supports the Commission's proposal to alter the funding plan for 2020-2023 for the Clean Transportation Program in response to the COVID-19 pandemic. We believe that the renewed focus on Recovery and Reinvestment is a decision that will help California recover from the financial losses caused by COVID and create jobs and economic resiliency. We support the reallocation of funding from the Alternative Fuel Production and Supply investment category, but recommend that the diverted funds also be shared with the Manufacturing investment category. In the proposed changes, the Commission indicates that the Manufacturing investment category will be decreased from $10 million in total funding to $9 million. Lion strongly recommends against lowering investment in Manufacturing as a response to the COVID-19 pandemic. The Manufacturing investment category should not be decreased – in fact, it should be increased, partially with the diverted funds from the Alternative Fuel Production and Supply category. An increased investment in Manufacturing will directly translate into new, permanent, high-quality, family-supporting jobs. Right now, California is in need of these types of jobs, and this will dramatically improve the state's economy as we begin our recovery from this pandemic.

With regards to the questions the Commission posed during the Clean Transportation Program Advisory Committee meeting on June 19, Lion would like to offer the following responses:

Has the latest version of the draft investment plan adequately addressed the impacts of COVID-19? If not, what additional changes to the investment plan should the CEC consider?

Lion believes the CEC has adequately addressed the impacts of COVID with the creation of the investment category “Recovery and Reinvestment.” However, we reiterate our recommendation that some of the funds diverted to this category be shared with the Manufacturing category in order to ensure the creation of permanent, high-quality jobs. If the CEC contributes additional funding to manufacturing within California, many high-paying jobs will be created and sustained by the manufacturing facilities established in the state in response to this funding source.

Where are the CEC’s biggest opportunities to use Clean Transportation Program funds to create jobs quickly and help stimulate the California recovery and support California businesses on our path to economic recovery?

Lion supports the CEC’s investment in manufacturing and medium- and heavy-duty (MDHD) zero-emission vehicles (ZEVs) and infrastructure as a means to create jobs and stimulate the California economy. As mentioned above, a robust investment in manufacturing will bring jobs in the clean transportation sector to California, and sustained investment in MDHD ZEVs will support the training and employment of thousands of future electric vehicle technicians. In order for California to meet its ambitious air quality goals, further investment in the MDHD ZEV sector is required and will necessarily result in the creation of countless high-quality jobs.

Have the changes made in the latest draft of the investment plan adequately prioritized high-quality job opportunities? If not, what additional changes to the investment plan should the CEC consider?

As expressed in our answer to the first question posed by the CEC, we stress that effective, widespread job growth can only be sustained by investing in manufacturing in this state. If the CEC invests in clean transportation manufacturing, companies will be drawn to California to establish new manufacturing facilities and will create permanent full-time jobs. With this funding from the CEC, California can become a hub of electric vehicle manufacturing and support the growth of the clean transportation sector that is needed to achieve our carbon neutrality goals.

Lion would like to thank the Commission for the opportunity to provide comments and looks forward to continuing to work together into the foreseeable future.

Sincerely,

Nate Baguio
Vice President of Sales