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<td><strong>Docket Number:</strong></td>
<td>20-FINANCE-01</td>
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<tr>
<td><strong>Project Title:</strong></td>
<td>Strategies to Attract Private Investment in Zero Emission Vehicle Charging Infrastructure and Other Clean Transportation Projects</td>
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<td><strong>TN #:</strong></td>
<td>240204</td>
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<td><strong>Document Title:</strong></td>
<td>Joint Parties comments on Resubmitted Joint parties comments on ZEV MHDV Loan RFI</td>
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<td><strong>Description:</strong></td>
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<td><strong>Organization:</strong></td>
<td>Joint Parties</td>
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<td><strong>Submitter Role:</strong></td>
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Resubmitted Joint parties comments on ZEV MHDV Loan RFI

Adding two more logos / signatures to original joint parties letter

Additional submitted attachment is included below.
California Energy Commission  
1516 9th Street  
Sacramento CA, 95814  

Submitted to docket 20-FINANCE-01

Re: Request for Information (RFI) on Medium and Heavy-Duty Zero Emission Vehicle Charging and Refueling Infrastructure Potential Loan Program.

Dear Commissioners and Staff:

The joint signatories write in support of the concept for a combined vehicle and infrastructure loan-loss reserve program for ZEVs as proposed by CALSTART, NRDC and SCE in their Oct 1 letter (called the Zero Emission Truck, Bus, and Infrastructure Finance (ZETBIF)) pilot, and in support of the Response those organizations filed for the Commission’s Request for Information on Medium and Heavy duty (MHDV) Charging and Refueling Infrastructure Potential Loan Program.

We are writing to support the “ZETBIF” pilot concept because we think it will provide an important and highly necessary tool to drive ZEV adoption in California. In response to the Commission’s questions, we agree that a financing program is severely needed to support the incremental cost for ZEVs and ZEV infrastructure, which is not always covered by public grants or incentives. We further support the assertion, in the CALSTART/ NRDC/ SCE Response that the CEC should combine $20M in CEC funds¹ with utility and other funds to create a $50M pilot, to be run either by the State Treasurer’s California Capital Access Program (CalCAP), run by California Pollution Control Finance Authority (CPCFA), or a new program through the California Economic Development Infrastructure Bank (iBank). We further agree that the ZETBIF pilot program would also validate the leveraging of fleet’s Low Carbon Fuel Standard (LCFS) credits as well as other fuel and maintenance savings as part of the loan provided by the financial institution and backed by a state-run loan-loss reserve.

¹ From the Recovery and Reinvestment Fund
ZEV adoption faces the same challenge as energy efficiency: even with a decent payback on investment vs. a diesel vehicle, many public and private fleets cannot make the switch because their capital budgets may not allow them to cover the incremental cost difference between a conventional vehicle and a ZEV, and these cost-differences may not be fully covered by state or federal incentives. The importance of financing was recognized by the CA legislature this year in passing SB 372 (Leyva), which calls for state agencies to work together on innovative financing for MHDVs specifically. Between 2019 and 2021 over 2,000 ZEV HVIP vouchers were requested—but this likely represents half of the demand for commercial ZEVs, or less. In addition, there are transactional barriers for private banks to provide loans to fleets for relatively new technology, and we understand commercial ZEVs may be viewed as risky due to unknown residual value.

Thank you for your consideration of our comments and the CALSTART/ NRDC/ SCE Response to the RFI. Please contact Meredith Alexander at malexander@calstart.org with any questions.

Sincerely,

Thom Peebles
Vice President, Marketing
ABC Companies

Lindsay Battenberg
Director, Government Relations & Public Policy
Proterra

Diana Kotler
Executive Director
Anaheim Transportation Network

Lauren Skiver
CEO/ General Manager
SunLine Transit Agency

Suzanne Merkelson
Public Policy & Govt Affairs
Arrival

Don Anair
Research and Deputy Director for the Clean Transportation Program
Union of Concerned Scientists

Heidi Sickler
Director of Policy
Amply Power, Inc

Kevin Kane
Executive Director / CEO
Victor Valley Transit Authority

Meredith L. Alexander
Policy Director
CALSTART

Aravind Kailas, Ph.D.
Advanced Technology Policy Director
Volvo Group North America

Orville Thomas
Director of Government Relations
The Lion Electric Company

Eileen Tutt
Executive Director
California Electric Transportation Coalition

Marcie Willard
Marketing Coordinator/Grants Specialist
Lightning eMotors

Michael Colvin
Director Regulatory and Legislative Affairs
California Energy Program

Alana Langdon
Sr. Manager, External Affairs and Public Policy
Nikola Corporation

Environmental Defense Fund

Simon Mui
Deputy Director, Clean Vehicles and Fuels
Natural Resources Defense Council

Ryan Gallentine
Policy Director, Electrifying Transportation
Advanced Energy Economy