

DOCKETED

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**Highland Electric Fleets Comments - on Electric School Bus
Infrastructure Workshop**

Additional submitted attachment is included below.

September 30, 2022

California Energy Commission
715 P Street
Sacramento, California 95814

Re. 19-TRAN-02 Electric School Bus Infrastructure Workshop

Highland Electric Fleets (“Highland”) respectfully submits these comments to the California Energy Commission (CEC) on the “Electric School Bus Bi-Directional Infrastructure Funding Concept” that CEC staff presented at the public workshop on September 13, 2022.

Highland is the largest buyer of electric school buses (EVSBs) in the country and provides a comprehensive turnkey solution in the form of a transportation-as-a-service (TaaS) contract that delivers EVSBs, charging infrastructure, and supporting services to school districts and third-party managed fleet providers (3PMs). Our model includes vehicle and charging infrastructure financing, infrastructure installation, charging management staff training, electricity purchasing, and maintenance cost coverage in an easily digestible, budget-neutral format that enables EVSB acquisition at traditional diesel pricing. Our mission is to promote better student health and a cleaner environment through school bus electrification.

Electrifying has high initial costs but lower operating costs over time. Highland flattens this cost curve, enabling districts to enjoy the benefits of an electric fleet within their existing budget. We enable schools to achieve budget neutrality by helping school districts apply to any available rebates, grants, incentives, etc., including any utility funding that may be available.

We applaud the CEC’s efforts in supporting innovative EVSB projects that expand community resilience and enable cost saving and revenue generating opportunities for school districts to electrify their fleets while providing grid supporting assets. Highland is currently deploying the first commercially operated vehicle to grid (V2G) school bus project in the country and believe that this technology not only leads to future cost savings for school districts but also enables electric school buses to operate as a community asset when the grid is down thereby enhancing community resilience.

We believe that this Funding Concept will enable the deployment of more real-world EVSB V2G examples that will lead to the development of best practices in deploying this technology across the State of California.

We would like to take the opportunity to comment on several components of this Funding Concept.

- Allow flexibility in ownership and partnership models to enable wider participation. Local Education Agencies (LEA) should be allowed to partner with third parties, like Transportation as a Service (TaaS) providers, to assist in the development of these projects. Enabling flexibility in ownership will enable more LEAs to participate.
- Limit funding availability to assets that support the development and testing of V2G and V2X.

Expanding funding to include the procurement and installation of additional DER and renewable generation will reduce the overall amount of funding that will directly support V2G project development. To ensure that this Funding Concept leads to lessons learned on the benefits of V2G in school bus applications, the funding should not be applied to any other type of DER technology. V2G enabling technologies that support islanding and black start capabilities should be eligible for funding. While we support the development of additional DER deployments across the state, we believe that additional funding should be set aside to develop those projects.

- Enable flexibility in site location.

Limiting projects to Tier 2 or Tier 3 High Fire Threat Districts puts an overly restrictive lens on project locations and fails to consider the additional benefits that V2G projects can have beyond emergency response. CEC should consider projects across the State of California to increase participation and to test a wide variety of possible use cases for V2G and V2X projects within LEAs. For example, there are a wide variety of locations that are currently grid constrained that would benefit from the peak shaving and/or shifting of electric load that EVSB V2G projects can provide.

Highland appreciates the opportunity to submit these comments.

Best Regards,

Jane Culkin

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Highlandfleets.com