

DOCKETED

Docket Number:	18-TRAN-01
Project Title:	School Bus Workshops
TN #:	253595
Document Title:	First Student, Inc Comments - on SB 114 Funding Available for Zero Emission School Buses and Infrastructure
Description:	N/A
Filer:	System
Organization:	First Student, Inc.
Submitter Role:	Public
Submission Date:	12/12/2023 4:41:01 PM
Docketed Date:	12/12/2023

Comment Received From: First Student, Inc.
Submitted On: 12/12/2023
Docket Number: 18-TRAN-01

on SB 114 Funding Available for Zero Emission School Buses and Infrastructure

Additional submitted attachment is included below.



600 Vine Street, Suite 1400, Cincinnati, OH 45402

December 11, 2023

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Docket 18-TRAN-01, Staff Draft Guiding Principles for SB 114 Funded Charging and Refueling Infrastructure Program

First Student, Inc. appreciates the opportunity to comment on SB 114 the Charging and Refueling Infrastructure Program. We applaud the California Energy Commission (CEC) in its on-going support for the transition to zero-emission school bus fleets. SB 114 provides a critical component of this effort by providing funding for charging and fueling infrastructure for the operation of zero-emission school buses across California. These efforts, in partnership with the California Air Resource Board's (CARB) HVIP program for school buses will reduce transportation pollutants, improve student and community health and help to meet California's ambitious climate goals.

First Student, Inc. shares the primary goal of SB 114, to support California school districts to transition from diesel buses to zero-emission school buses. We appreciate the engagement efforts that the CEC is making to hear from interested parties. First Student has reviewed the Staff Draft Guiding Principles for SB 114 and hope that the comments below help to inform the process.

- First Student agrees with the Guiding Principle statement that, "ensuring Local Education Agencies can access the program's funding is a priority". This funding is needed in order to reduce the significant costs associated with implementing school bus charging stations. However, limiting SB 114 funding to Local Education Agencies (LEAs) that own their own buses creates an inequitable two-tiered system, where school districts which do not have ownership of title buses cannot participate. This inequity will result tens of thousands of California students and many communities being totally shut out of the opportunity to access zero-emission school transportation.
- Many school districts simply cannot afford to own, operate, and maintain school buses, parking depots and facilities, nor do they have the transportation manpower to hire drivers and negotiate union contracts. In many cases school districts contract with school bus transportation providers, so they can keep their focus on educating students, while receiving newer buses, and reliable, safe student transportation. Most school districts have even less experience with new electric vehicles and charger technology or in overseeing construction projects for electric charging stations. These are complex projects, which require not only professionals with experience in installing electric charging stations, but also experts that understand the daily transportation operations of school districts. Excluding private transportation providers from accessing SB 114 funding, will result in fewer zero-emission projects being successfully deployed for school districts, often the disadvantaged school districts which already could not own or operate bus fleets.



First Student Inc. is the largest school bus transportation provider in North America, with nearly 50,000 buses across the US and Canada. First Student also has the largest fleet of electric school buses in operation and has made the commitment to put 30,000 electric school buses in operation by 2035.

Given California's mandate to transition to EV school buses, excluding school districts that do not own school buses, and private school bus transportation providers, like First Student, from participating in this opportunity will significantly hinder the deployment of zero-emission school buses across the state. This will ultimately put significant financial pressure on school districts who have been excluded from participation in SB 114 but who also must meet the California mandate.

First Student operates more than 2,000 buses in California, in all regions of the state. First Student has the professional staff (electrical engineers, charging experts, project managers) and experience deploying electric charging infrastructure to assist school districts to meet their plans for electric school buses, and to support California to meet its climate goals. Excluding one group of school districts, as well as private school bus transportation contractors from accessing this funding does not seem to be in alignment with the program goals.

First Student respectfully requests that if private school transportation providers are not allowed to participate in the SB 114 opportunity, that a full legal opinion verifying this exclusion be made available.

Sincerely,

Kevin L. Matthews

Kevin L. Matthews,
Head of Electrification, First Student, Inc.

