

DOCKETED	
Docket Number:	18-TRAN-01
Project Title:	School Bus Workshops
TN #:	253667
Document Title:	VEIC Comments on Draft Guiding Principles for SB114 Funded Charging and Refueling Infrastructure Program
Description:	N/A
Filer:	System
Organization:	VEIC
Submitter Role:	Other Interested Person
Submission Date:	12/19/2023 10:51:52 AM
Docketed Date:	12/19/2023

*Comment Received From: VEIC
Submitted On: 12/19/2023
Docket Number: 18-TRAN-01*

VEIC Comments on Draft Guiding Principles for SB114 Funded Charging and Refueling Infrastructure Program

Additional submitted attachment is included below.



December 19, 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

VEIC appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Staff Draft Guiding Principles for SB 114 Funded Charging and Refueling Infrastructure Program. This program will accelerate the deployment of clean school buses across the state, yielding significant health benefits for California's youth and environmental benefits for local communities. Importantly, an equitable transition to zero emission vehicles will also help the state achieve its climate goals. We applaud the CEC and CARB for integrating community and stakeholder input into the program design.

To enable successful clean school bus and equipment deployments, VEIC believes that technical assistance is necessary for implementation of this program. VEIC has extensive experience developing, planning, implementing, and evaluating pilot demonstrations for zero emission school buses and has a unique perspective from which to respond. We have worked on several pilot demonstration efforts focused on deploying battery electric vehicle and charging stations for school districts across the country. Through our work, we have seen first-hand the importance of ensuring that school districts have qualified, independent technical assistance when dealing with zero emission school buses at this stage of market development.

Technical assistance, in this context, may refer to planning support and implementation related to the procurement and deployment of chargers and charging infrastructure for electric school buses. As we have seen in numerous electric school bus projects, there are many reasons why school districts benefit from technical assistance. Namely, school districts and other educational entities may be resource-constrained and not have the bandwidth to identify vehicles best suited for electrification (such as thorough bus route analyses), conduct research on vendors and product specifications, facilitate site assessments to determine initial charging strategy, and develop a plan to transition their existing fleet to electric over time. These are just some examples of the many fleet transition responsibilities that school transportation officials and operators encounter in addition to their normal day-to-day functions. In this way, giving districts access to vehicles or charging assets is only part of the solution; there is additional up-front

planning needed to deliver successful projects and outcomes. However, technical assistance is much more than project management. It ensures that school districts receive the support they need to avoid mistakes and thus follow steps that have led to successful deployments in other districts. Simply put, effective technical assistance can help school districts save on costs and deploy assets right the first time.

VEIC has nearly a decade of experience expediting deployments and avoiding gaps in planning. An example that we feel is particularly on-point is that VEIC recently worked as a Technical Assistance provider (via WRI's Electric School Bus Initiative) for Boston Public Schools (BPS) to assist them with their initial 20-bus deployment pilot. The technical assistance VEIC provided along with diligent scheduling and communication led to a successful deployment. BPS utilized VEIC to help vet the vendor recommendations, and valued VEIC's input as an unbiased third party that could be trusted throughout the process. BPS was able to order their buses in April 2022 and the buses were delivered and on the road in February 2023. Now BPS is well on their way to transitioning more of their 700+ bus fleet to electric vehicles. This example demonstrates what happens if school districts have technical expertise supporting them with everything from planning to infrastructure deployment.

Upon reviewing the CEC's SB 114 Funded Charging and Refueling Infrastructure Program Draft Guiding Principles from November 2023, VEIC provides the following comments.

- **Implementation Manual** - The CEC notes that the "implementer will also develop a list of entities that can provide technical assistance to grant awardees, which shall include but not be limited to recommending the appropriate infrastructure equipment, site evaluation, utility assessments, and general planning." VEIC recommends the CEC consider making funds available to support school districts with their planning efforts as part of any grant proposals. This will ensure that all school districts, particularly under-resourced systems, will have access to the support needed to ensure successful electric bus deployments. Funds for technical assistance should *not* be deducted from what schools may receive to purchase new buses and charging equipment. At a minimum, VEIC recommends the implementer frame the list above as entities that can help provide technical assistance prior to being awarded a grant, even if the CEC does not make Technical Assistance funds available.
- **Energy Equity and Priority Awardees** - VEIC supports the CEC and State's commitment to "reducing energy equity gaps and investing in underserved communities across California." In addition to the Priority Grantees that the Draft Guiding Principles asks the third-party implementer to focus on, VEIC recommends the CEC consider prioritizing

districts which are disproportionately burdened by pollution. One approach to do that may be to leverage California Office of Environmental Health Hazard Assessment (OEHHA)'s existing [CalEnviroScreen tool](#)¹, which "helps identify California communities that are most affected by many sources of pollution, and where people are often especially vulnerable to pollution's effects." By taking this approach, the CEC can be sure that funds are being directed to communities most vulnerable to pollution.

- **Outreach and Education** - VEIC recommends that the implementer deliver a plan for partnering and engaging with relevant California school officials and organizations. These officials and organizations may be found on the [Schools Services of California website](#). In VEIC's work supporting state programs delivering electric school bus fleet planning support across the U.S., we found it helpful to get the word out through school officials and relevant organization newsletters, webinars, and conferences. From a program administration standpoint, this has been critical for grantee recruitment.
- **Funding** - The Draft Principles indicate that the "procurement of charging or fueling infrastructure and related costs such as, but not limited to, equipment, site design, construction, infrastructure upgrades, and warranty must make up at least 90 percent of a grantee's award." We recommend "related costs" cover planning (which may include developing a charging infrastructure implementation plan and engineering), implementation support (which may include facilitating charging infrastructure procurement and installation, and staff training), and evaluation and verification (which may include analyzing charging data to assess whether anticipated benefits are realized). Planning, implementation support, and evaluation will lead to positive project outcomes and help avoid common pitfalls such as cost and schedule overruns. The CEC should consider providing additional funding for districts that submit a Charging Infrastructure Plan with their grant application. NYSERDA's Charging Voucher² structure detailed below can serve as an example for the CEC to follow. It is important to note that Charging Voucher Fleet Electrification Plans can be completed by any third-party entity, however, NYSERDA pushes for organizations to work through them (as they have some organizations they have already vetted).

¹ OEHHA CalEnviroScreen, <https://oehha.ca.gov/calenviroscreen/about-calenviroscreen>

² NYSERDA New York Incentive Program Overview, <https://www.nyserdera.ny.gov/All-Programs/Electric-School-Buses/NY-School-Bus-Incentive-Program-Overview>

	Base Voucher Amount	With Fleet Electrification Plan
Non-priority District	\$25,000	\$55,000
Priority District	\$35,000	\$65,000

In conclusion, every school district is at a different point in their electrification transition, and with different scale and challenges, programming should be flexible enough to account for these differences. Right-sized technical assistance and electrification planning will allow for that outcome and can be a tool to efficiently and effectively elevate a district’s knowledge of electrification. This is required for the long-term success of this program and to meet the state’s clean energy goals.

Thank you for considering our comments. VEIC looks forward to sustained collaboration with the CEC to accelerate California’s transportation electrification goals. Please do not hesitate to contact VEIC using the information listed below if you have any questions or if we can provide additional information.

Sincerely,



Jennifer Wallace-Brodeur

Managing Director, Energy Services Consulting at VEIC