

DOCKETED

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Additional submitted attachment is included below.

December 19, 2023

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: The Lion Electric Co. USA Inc. Comments on SB 114 Grants for Zero Emission School Buses and Infrastructure (ZESBI)

The Lion Electric Co. USA Inc. (Lion) applauds the California Energy Commission (CEC) for the implementation of a new incentive program for electric school buses in California. Lion would like to express its excitement about this program, for it will help achieve California's greenhouse gas emission reduction targets. Targeted programs like this are instrumental in aiding fleets with the adoption of zero-emission school buses. Lion appreciates the opportunity to provide comments on the CEC's proposed program design and looks forward to collaborating with stakeholders to help shape this critical program.

Incentive Amounts

Lion appreciates the CEC's effort to reduce the financial barrier of purchasing ZEV school buses by allowing the ZESBI program to potentially fund the entire cost of the school bus. Project cost is one of the greatest determinants of whether a school district will pursue a fleet electrification project. Many school districts face budget constraints, restricting their ability to purchase a ZEV school bus. As such, we suggest that the CEC prioritize providing higher funding amounts to fewer applicants in order to cover the full amount of their school bus electrification project.

Application Format

Extensive narrative requirements often discourage districts with limited resources from applying to relevant funding opportunities. Lion agrees with the requirement to create a simplified application process for SB 114 funds to increase the pool of potential applicants. In addition, Lion strongly agrees with the mandate to create a joint application to request funds for both the ZEV school buses and charging infrastructure to streamline the application process.

Program Eligibility

In the draft guiding principles under Program Eligibility, we recommend clarifying Point B, "A school district or charter school that contracts with a county office of education or private contractor for the maintenance and operation of its school buses" to state whether private contractors who have ownership of the school bus(es) will be able to apply for this program.

Program Implementation

Lion Electric strongly agrees that SB 114 funds should be allowed to be combined with local, state (including CEC-funded opportunities), and federal sources of funding. Doing so would allow applicants to leverage multiple sources of funding if the project cost is not fully covered by SB 114 funds.

Lion would like to thank the CEC for the consideration of our comments on the development of the SB 114 Grants for Zero Emission School Buses and Infrastructure Program. We look forward to continued collaboration with the CEC throughout the development of this grant program. Please do not hesitate to contact us for additional information.

Sincerely,

The Lion Electric Team