

**DOCKETED**

<b>Docket Number:</b>	18-TRAN-01
<b>Project Title:</b>	School Bus Workshops
<b>TN #:</b>	255753
<b>Document Title:</b>	Pawan Kumar Comments - SB 114 Funding Available for Zero Emission School Buses and Infrastructure
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Pawan Kumar
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	4/17/2024 3:05:35 PM
<b>Docketed Date:</b>	4/17/2024

*Comment Received From: Pawan Kumar  
Submitted On: 4/17/2024  
Docket Number: 18-TRAN-01*

**18-TRAN-01 SB 114 Funding Available for Zero Emission School Buses and Infrastructure**

*Additional submitted attachment is included below.*

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Comment: 18-TRAN-01 SB 114 Funding Available for Zero Emission School Buses and Infrastructure

Dear California Energy Commission and California Air Resources Board Staff

Zūm appreciates the opportunity to comment on the proposed guidelines for SB 114 funding, which aims to accelerate the adoption of Zero-Emission School Buses in California.

We commend the California Energy Commission(CEC) and the California Air Resources Board (CARB) for their commendable efforts in promoting zero-emission transportation in California school districts. The transition to zero-emission school buses is a pivotal step in reducing environmental impact and safeguarding the health and safety of our future generation.

#### **Zūm - An industry driver for reinventing school bus transportation**

Zūm is on a mission to revolutionize student transportation, moving beyond the status quo towards a future where innovative technologies are used to advance sustainability efforts. Founded in 2015 and based in California, Zūm combines advanced technology with a fleet of eco-friendly vehicles to optimize and streamline school bus routes, ensuring real-time tracking, safety, and cost-efficiency. The company is dedicated to reducing the environmental impact of school commutes and improving the transportation experience for students, families, and school districts.

The company provides transportation services to many major public school districts in California. Most of our bus yards are located within the top 25% of the CalEnviroScreen 4.0 score, making moving to an electric school more important for Zūm.

#### **Inclusion of Private Fleet Operators:**

We strongly recommend that the scope of SB 114 funding include Local Education Agencies(LEAs) that directly own and operate buses and private transportation providers to be allowed as co-applicants who collaborate with LEAs. Excluding private operators can limit the reach and effectiveness of the program, particularly in districts that rely on contracted services due to financial or logistical constraints.

#### **Provide Maximum Flexibility in Stacking with Other Sources of Funding**

We strongly urge CEC and CARB to provide maximum flexibility in stacking SB 114 funds with other funding sources, including the EPA Clean School Bus program, DERA, VW Environmental Mitigation Trust, and other such incentives. This enhanced flexibility will allow the districts more options to bridge the gap between SB 114 funding and vehicle costs, promoting the feasibility of deploying zero-emission school buses and infrastructure.

**School Bus Eligibility**

We advocate for CEC and CARB to permit districts with bus models from the year 2010 or newer, situated in Disadvantaged Communities (DAC) or Low-Income Communities (LIC), to qualify for bus replacement programs. Limiting eligibility to buses from the model year 2010 or older could unfairly exclude high-priority districts that do not have older buses to replace.

Pawan Kumar  
Fleet Electrification Program  
Zūm Services, Inc