

DOCKETED

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April 17, 2024

California Energy Commission (“CEC”)
1516 Ninth Street
Sacramento, CA 95814

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

Dear California Energy Commission and California Air Resources Board Staff,

RIDE appreciates the opportunity to submit additional comments regarding the Fiscal Year 2023-24 SB 114 Zero Emission School Buses and Infrastructure (ZESBI) Grant. We would like to express our gratitude to the CEC and CARB staff for reaching out and accepting our previous feedback. As a leader in electric school bus technology, RIDE is ready and eager to collaborate with CEC and CARB to achieve the state’s critical zero-emission school bus goal by 2035.

RIDE – An Industry Driver in California

We are a global company revolutionizing zero-emission technology across all medium and heavy-duty (MHD) markets, encompassing buses and trucks. Our Lancaster manufacturing facility, operational since 2013, has evolved into a 550,000-square-foot green technology hub with hundreds of union employees. Currently, the Lancaster facility can produce 1,500 MDH Zero Emission Vehicles (ZEVs) annually and is poised to meet growing market demands. RIDE, representing Real Innovation Delivered with Excellence is an American spinoff of BYD. RIDE will take the reins in much of the BYD transit and school bus market.

RIDE provides the following information for the Board to consider when implementing this grant and to expedite the equitable transition to zero-emission school buses for California’s youth.

Flexibility in Replaced School Buses’ Model Year and GVWR Requirements

RIDE suggests that CEC and CARB allow school buses with less than 10,000 lbs GVWR and Model Year 2010 or newer to be eligible for replacement, or at least allow a case-by-case review to avoid discouraging districts that are willing to electrify. We understand that the agencies’ aim to prioritize replacing the oldest and dirtiest buses first. However, many districts have a mix of Class 2b to Class 8 buses depending on their size, needs, and local terrain. In fact, some schools we work with, located in mountain or urban fringe areas, primarily operate Class 2b vehicles and are unable to replace them using available funding due to the GVWR requirements.

Additionally, as the state enters the fifth year of providing funding for electric school buses, many districts have already replaced their oldest fleets and are now looking to transition their 2010 or newer diesel vehicles to achieve 100% zero emission. We encourage CARB to consider eliminating the model year restriction to facilitate a full fleet transition and maintain school districts' interest in electrification, especially in this middle stage of the state ESB funding cycle.

Provide Maximum Flexibility in Stacking with Other Sources of Funding Beyond Just AB 923

RIDE strongly suggests that CEC and CARB consider aligning with the current HVIP stacking standard for small fleet owners and providing more flexibility in stacking SB 114 vehicle funding with other sources of state incentives. Not all air districts choose to allocate AB 923 funding to medium-heavy-duty (MHD) vehicles or school bus replacement projects. Many rural, small, and agricultural air districts in the



Central Valley or Northern California allocate AB 923 funds for passenger vehicles or off-road equipment. Consequently, the proposed limitation of stacking only with AB 923 imposes significant constraints on school districts located in these underserved air districts, making it a challenge for them to combine funding sources and replace vehicles. The proposed per-vehicle funding level does not fully cover a vehicle's total cost after taxes. Maximizing stackability with other funding sources will greatly benefit these districts in need of financial support to electrify their fleets. RIDE would appreciate the efforts of CEC and CARB staff to list additional stackable programs and provide instructions and rules for applicants in the grant implementation manual.

HVIP Voucher Cap, Third-Party Applicants, and Fleet Cap

RIDE encourages CARB and CEC to clarify the HVIP program-wide voucher cap and fleet rule for this grant. Additionally, we recommend that both agencies consider creating eligibility for third-party applicants serving public school districts. This approach would enable third parties to assist school districts, particularly under-resourced ones, in applying for funding on their behalf. If third-party applicants are allowed, we further suggest that they not be subject to the 30-per-year unredeemed voucher cap or the fleet size limitation. The overarching goal is to fund as many school buses as possible, and we urge the agencies to provide maximum flexibility in this regard.

We want to reiterate our recognition of the hard work CARB and CEC staff have put into this meaningful incentive and express our sincere appreciation for the opportunity to voice our support and suggestions. Please do not hesitate to contact me if you have any questions or would like to discuss further.

Sincerely,

A handwritten signature in cursive script that reads "Angel Yin".

Angel Yin
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