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Comments On Behalf of VIA Motors

Additional submitted attachment is included below.

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November 12, 2015

Commissioner Janea Scott
Lead Commissioner for Transportation
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Dear Commissioner Scott;

On behalf of our client, VIA Motors (VIA), we are submitting formal comments to the Draft Staff Report for the 2016-17 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP): Docket No. 15-ALT-01. Our client's concerns are focused on Chapter 5 of the report, Alternative Fuel and Advanced Technology Vehicles and the fact that the CEC's proposed investment plan omits a very large class of vehicles that should be eligible for demonstration project funding.

Background

VIA Motors produces extended-range near-zero emission vans and trucks. VIA Motors has an exclusive agreement with General Motors (GM) to convert GM trucks and vans to plug-in, near-zero emission, electric vehicles. Vehicles that traditionally get 12 to 18 miles per gallon are converted to get up to 100 miles per gallon, with an all-electric range of 40 miles. The vans and trucks include exportable power, allowing lights and power tools to be plugged directly into the vehicle, thereby eliminating the need to use gas and diesel generators and further reducing emissions.

VIA's manufacturing facility is located very near the GM manufacturing plant, allowing them to take possession of the vans and trucks directly from GM. VIA then replaces the manufacturer installed transmission and adds batteries. All other GM manufactured equipment and technology remains.

Comments

VIA Motor's concern is that the ARFVTP investment plan excludes VIA trucks and vans from funding eligibility, despite their obvious potential for greatly reducing petroleum fuel use. The investment plan does not provide any funding for "light-weight" vehicles weighing less than 10,000 pounds because traditional auto manufacturers have been successful developing, manufacturing, and selling vehicles in the class (i.e. Toyota Prius, Nissan Leaf, Chevrolet Volt).

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The investment plan does propose $23 million for “medium and heavy-duty” vehicles weighing more than 10,000 pounds. However, the problem is that VIA’s vehicles weigh less than 10,000 (Chevrolet van weighs 9,350 lbs. and the Chevrolet Silverado truck weighs 7,500 lbs). Yet VIA is clearly addressing a major segment of transportation stock that auto manufacturers are ignoring. When comparing vehicle fuel efficiency, vans and trucks perform poorly compared to other “light-weight” passenger vehicles. As previously mentioned, this class of vehicle usually only achieves a fuel efficiency of less than 20 miles per gallon. Light trucks and vans are clearly among the poorest performing vehicles on the road when it comes to fuel efficiency

In addition, there are millions of vans and trucks on California’s roads and highways. Major commercial fleets that use vans and trucks for service, repairs, and carpooling. The top three selling vehicles in the United States are the Ford F Series truck, the Chevrolet Silverado truck, and the Dodge Ram truck.

Finally, the auto manufacturers are not addressing this vehicle class. In fact, none of the major truck manufacturers have begun research and development for producing a plug-in electric, extended range, near-zero emission van or truck. VIA is one of the only, and perhaps the only, company producing vehicles in this class. Many of VIA’s competitors have already left the market. VIA will not be able to continue for much longer unless California demonstrates an interest in providing incentives and promoting this class of vehicle.

VIA has been working with the California Air Resources Board (CARB) on certification for the HVIP program. In addition, they have talked with the University of California about a carpool demonstration project. VIA has also had conversation with the Department of General Services about demonstration projects. In the private sector, VIA has sold their trucks to PG&E for a demonstration project in Davis. They have also had continuing discussions with other major fleet operators, including FedEx and Comcast.

However, ultimately VIA needs the State of California to provide some level of financial assistance to help with the “incubation” of this new technology. VIA sees CARB and the CEC as potential partners. However, the ARFVTP investment plan excludes vehicles that VIA Motors produces. Therefore, we urge you to adjust the investment plan to either change the definition of “Medium and Heavy-Duty” vehicles to include vehicles weighing more than 7,000 lbs or to include a new funding category that would capture extended-range electric vans and trucks.

Sincerely,

TRENT SMITH