

## DOCKETED

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*Comment Received From: Alex Cherepakhov*

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**First Priority GreenFleet Comments on the 2016-17 Investment Plan Update for the ARFVTP**

Comment Letter Attached

*Additional submitted attachment is included below.*

***YOUR TOTAL SOLUTION PROVIDER  
FOR SUSTAINABLE FLEET TECHNOLOGY***



April 25, 2016  
Commissioner Janea Scott  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

RE: 2016-17 Investment Plan Update for the Alternative and Renewable Fuel & Vehicle Technology Program

Dear Commissioner Scott,

First Priority Global GreenFleet, a leader in deploying fleet vehicles—including zero-emission school buses and zero-emission trucks—appreciates the opportunity to provide comments on the 2016- 2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP).

First Priority GreenFleet is a full service provider of sustainable fleets, providing customers with a full range of zero-emission vehicles and infrastructure options to meet their needs. First Priority GreenFleet is a division of First Priority Global, which is one of the largest and most reliable providers of specialty commercial fleet vehicles in the United States. Our mission is to revolutionize the industry with a customer-centric service network—continuing the legacy of First Priority’s success deploying and servicing specialty commercial fleets and now expanding our core expertise to bi-coastal manufacturing with an extensive service network.

First Priority recently acquired the assets of Electric Vehicles International (EVI), and is very proud to expand manufacturing of EVI’s zero-emission medium-duty delivery trucks, as well as the suite of EVI vehicles, at the EVI facility in Stockton, California. In addition, First Priority GreenFleet offers the first zero-emission, purpose-built school buses in North America – eLion (Type C) and Trans Tech/Motiv (Type A) that collectively cover the majority of school buses in California and beyond. First Priority is committed to serving school districts with clean, state-of-the-art school buses that eliminate toxic exposures and improve safety for students. School buses are the largest segment of mass transit in the United States and, unfortunately, are among the oldest and dirtiest fleets on the road.

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***Specific Comments on the 2016-2017 Funding Plan***

1. First Priority strongly supports staff's proposal to allocate \$23 million for Medium-and Heavy-Duty Vehicle Technology Demonstration and Scale-up and Manufacturing. This funding is needed to further accelerate and expand medium- and heavy-duty vehicle manufacturing in

California, as well as support innovative technologies and market expansion for demonstration projects to reduce greenhouse gas emissions and improve air quality. There is an immediate need to conduct manufacturing and small-scale demonstration projects for zero-emission school buses and medium-duty trucks in conjunction with the scale-up or retool of manufacturing or assembly lines.

2. Additionally, First Priority strongly encourages the early release of a Program Opportunity Notice (PON) in FY 2016-2017, as FY 2015-2016 reallocation of the manufacturing funding has delayed and potentially jeopardized further manufacturing and demonstration of medium- and heavy-duty zero-emission vehicle technology in California. There is an immediate need to accelerate the release solicitation in order to continue the success of zero-emission vehicle manufacturing in California, which will help accelerate the demonstration of vehicles to reduce greenhouse gas emissions and grow jobs throughout the state.

We respectfully request an inclusive solicitation that is open to the full range of medium and heavy-duty technologies, including sustainable freight, sustainable logistics (with associated technology transfer to HD ZEVs), sustainable school buses, sustainable manufacturing and associated critically important R&D needed to optimize and bring down the upfront costs of many types of medium and heavy-duty zero-emissions vehicles.

Thank you for the opportunity to comment on the 2016-2017 Investment Plan Update for the ARFVTP. We appreciate the leadership of the California Energy Commission to accelerate the manufacturing and demonstration of zero-emission medium- and heavy-duty vehicles to reduce greenhouse gas emissions, improve air quality, and create jobs throughout the state.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex'.

Alex Cherepakhov  
CEO