

DOCKETED

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Marty Turock Comments School Bus Replacement Program

SB 110 School Bus Replacement Program Comments

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1. Should the new buses be all electric?

Both Senate Bill 32 and Senate Bill 350 established California's 2030 GHG reduction target of 40% below 1990 levels. With the transportation sector contributing the largest and growing source of GHG emissions across the State, SB 350 mandates that both CARB and the CEC "accelerate widespread transportation electrification" to reduce dependence on petroleum, increase the adoption of zero-emission vehicles, help meet air quality standards, improve public/student health, and facilitate future vehicle grid integration.

While \$75 million sounds like a large amount, at the current estimated pricing for electric school buses (~\$350,000) this would only fund the purchase of ~214 standard size school buses. So the best way to launch the electrification of K-12 Schools transportation across the state is to allocate the total \$75 million to all electric buses. All school districts and COEs that receive these EV school bus grants will be required to install the prerequisite EV infrastructure that will hopefully establish a critical mass to jumpstart the desired market transformation for a key public sector segment that would not otherwise be able to afford these EV bus purchases.

2. How should funds be distributed?

Following from my previous comment, we can estimate that a total of ~300 electric school buses will be purchased when we account for the actual mix which will most likely include some smaller buses. It would appear that the best way to drive the desired widespread market transformation would be to divide funds equally among the four regions and replace the oldest buses in each region. This would result in ~75 electric school buses put into service in each of the state's four regions. In this manner we would achieve the maximum number of "pilot sites" distributed across the entire state that will serve as reference validation sites that nearby school districts can visit and model to facilitate and accelerate broad replication/adoption.

3. How to determine the oldest school buses?

In order to have the most accurate and up-to-date information to truly identify the oldest buses across the state that are intended to be eligible for this Bus Replacement Program it is recommended that the grant application require that each school district provide the basic information, such as age of the bus, intended usage, and student ridership.

NOTE: Since many school districts attempt to minimize the usage of their oldest vehicles, previous year's mileage may be requested, but should not be a primary determining factor.