

DOCKETED

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ADOMANI Comment Letter re Prop 39 School Bus Replacement Program

Additional submitted attachment is included below.



Submitted via <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=18-MISC-02>

March 8, 2018

Jennifer Masterson
California Energy Commission
Grants and Loans Office
1516 Ninth Street, MS-1
Sacramento, CA 95814
(916) 654-4606 / Jennifer.Masterson@energy.ca.gov

RE: ADOMANI Comments on California's Program Concept for Bus Replacement, ECAA-ED & Prop 39

Dear Ms. Masterson –

As the President and CEO of ADOMANI, Inc. (ADOMANI), I commend California and the California Energy Commission on its efforts to move forward on Senate Bill 110, (Chapter 55, Statutes of 2017), which will allocate up to \$75 million to be provided to school districts and county offices of education for grants or loans for school bus retrofit or replacement. In response to the Energy Commission's request, I have outlined recommendations that addresses how California can best distribute these funds.

ADOMANI manufactures the zero-emission All American rear engine (RE) electric bus chassis for the Blue Bird Corporation, which is part of our premier product line of medium- and heavy-duty all-electric vehicles. Our All American RE school bus offers battery capacities between 100 kWh and 150 kWh, with an expected 80- to 100-mile range on a single charge. ADOMANI has demonstrated experience in the new and conversion markets, the latter of which helps our customers cost-effectively repower to all-electric or hybrid drivetrains. As a testament to our team's long-standing industry leadership, ADOMANI takes pride in our relationships with trusted service partners to address customers' specific needs.

Phase 1 Feedback

1. What is the preferred method for Phase 1: Develop a list or conduct an application process?

ADOMANI believes that the CEC should send out their solicitation for application and use the applications as their list for school bus replacement. Developing a list of the entire California School Bus Fleet while useful does not mandate the schools apply and replace their buses. So the concern to replace the oldest buses should be tempered by the school districts that are willing to replace their older diesel school buses with clean all-electric school buses.

2. Is the Energy Commission's bus data accurate?

Given all the replacement programs in California and the natural replacement cycle the data collected year over year becomes obsolete almost as soon as it's collected. If the CEC uses the data from the applications as received and replaces the oldest buses from that list, we believe that the goals will be accomplished.

Phase 2 Feedback

3. Is there anything missing from the proposed approach?

By conducting a competitive solicitation for school bus manufacturers, the Energy Commission will successfully develop a capable list of OEMs. This strategy is akin to the successful Hybrid and Electric Vehicle Voucher Incentive Program in that it requires the pre-screening of technologies and vehicles. Given the success of that program in California, we agree with the Energy Commission's proposed Phase 2 strategy.

Furthermore, we agree with the proposed requirements for manufacturers to provide vehicle production capabilities. By doing so, the Energy Commission will establish a culture of commitment to the program, while also ensuring the best applicants come forward. We note that the Energy Commission can and should take a proactive approach in communicating the information collected to interested school districts and school bus operators, thereby creating future electric school bus deployment opportunities.

4. Is 6 months for delivery of a bus reasonable? What is reasonable timing for delivery of a bus? One bus vs. multiple buses?

A 6-month delivery window is not reasonable because of the expected production volumes. Assuming orders more than 100 or more new electric buses, we would recommend a longer lead time for delivery of the buses. In other programs the time line has been set at the outset by providing guidelines for Grant Application receipt, date when expected grantee will be notified, the date when the Purchase Orders need to be issued and the final date when the buses need to be delivered.

5. At what number of buses would a manufacturer be able to offer a discount / bulk pricing?

As a technology manufacturer, the pricing strategy is not our domain. The dealerships are ultimately responsible for the pricing strategy, which would reflect the discount for bulk pricing. ADOMANI, as a partner with Blue Bird, would be happy to discuss the particulars of the pricing strategy with Energy Commission, upon request.

6. What should be included in the standard features of a bus?

There are various CO-OP/Piggy Back bids which provide specifications for the base bus. These bids also include the various options (A/C, Seating, etc.) available. We feel that one or more of the school buses dealers should supply these to the CEC for their review and acceptance as base school bus standards for the opportunity.

Distribution of Awards Feedback

7. Which scenario (1 or 2) addresses the requirements of SB 110 better? Why?

ADOMANI recommends that the Energy Commission distribute funds based on evaluation criteria, including the age of the base, community type, and student profile. Not only is this recommendation in line with our recommendations detailed above in question 1, but it also fully satisfies the goals of SB 110 detailed in Section 26205.5(a)(1)(A) and noted here:

*Priority shall be given to school districts and county offices of education operating the oldest school buses or school buses operating in disadvantaged communities, as identified pursuant to Section 39711 of the Health and Safety Code, as determined by the State Air Resources Board, and to school districts or county offices of education with most students eligible for free or reduced-price meals in the prior year.*¹

Infrastructure and Workforce Feedback

8. What type of infrastructure will you need to support your replacement bus?

A level 2 charger will be required for school districts to meet the anticipated duty cycle. Some schools/transportation yards are older and will require facility upgrades to accommodate electric buses. In addition, trenching and other upgrades will be required when multiple buses are added to the electric fleet.

9. What type of training and development will you need to support your replacement bus?

As in past programs where the fueling changes from diesel to CNG or Propane there are several methods to train the many school district personnel involved in the new electric bus implementation. The first approach at the district level is to receive training from the manufacturer, local dealer or technology provided coordinated through the main district contact the OEM school bus dealer. The program best received is one called, **Train-The-Trainer**. In this scenario the Dealer/OEM provides training to the person at the school district responsible for training the drivers and mechanics and that person in turn provides training to additional school personal.

Conclusion

The market for all-electric and hybrid vehicles has grown steadily in recent years due to technology advancements and greater private sector involvement. Furthermore, production costs continue to decrease and battery capabilities have improved.² Recognizing the need for California to address harmful diesel emissions, generate economic benefits, and deliver environmental justice benefits while also providing fleets with total cost of ownership benefits, ADOMANI commends the state and the Energy Commission on its efforts to create this funding opportunity.

¹ "Senate Bill No. 110, Chapter 55." California Legislative Information, July 11, 2017. https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB110, accessed February 22, 2018.

² Schlosser, N. "Can Electric School Buses Go the Distance?" School Bus Fleet, May 23, 2016. <http://www.schoolbusfleet.com/article/713421/can-electric-school-buses-go-the-distance>.

We offer our support in the rollout of these funds and, towards that end, we request the opportunity to meet with you to discuss our comments further. Should you have any follow-up questions please contact me at (949) 200-4613 or via email at jim.r@adomanielectric.com.

Sincerely,

A handwritten signature in black ink, reading "Reynolds", with a horizontal line underneath.

Jim Reynolds
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