

DOCKETED

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Proterra Comments on Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Additional submitted attachment is included below.



November 8, 2019

California Energy Commission
1516 9th Street
Sacramento, CA 95814

RE: Docket No. 19-TRAN-02 – Concepts for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear CEC Commissioners and Staff,

Thank you for the opportunity to provide comments on the proposed concepts for medium- and heavy-duty zero-emission vehicles and infrastructure as part of the California Energy Commission's Clean Transportation Program.

Proterra designs and manufactures an industry-leading fuel-efficient battery-electric bus. Our buses feature on-route, fast-charge technology perfect for circulator routes at airports and in city centers, as well as an extended range depot charging option that meet the needs of nearly all transit routes on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions. Proterra's headquarters and battery assembly are in Burlingame and bus manufacturing in the City of Industry- enabling Proterra's zero-emission buses to be designed and manufactured by Californians and supported by California supply chains. We greatly appreciate the strong support from the Energy Commission for both manufacturing facilities, which helped move our headquarters to California and expand manufacturing throughout the state.

Proterra's comments include:

1. We strongly support the Proposed Concept #2: Transit and Truck Fleets. Zero-emission buses provide direct benefits to disadvantaged communities, helping to eliminate mobile emissions and provide zero-emission miles for all. We respectfully request expanding eligibility to include zero-emission school buses within this funding category.

There is a need to focus funding on technologies that will help fleet operators achieve zero-emission requirements, especially with the recent approval of the Innovative Clean Transit initiative, the Airport Shuttle Bus Regulation, and the anticipated development of an Advanced Clean Trucks rule by the Air Resources Board.

2. To help accelerate the deployment of zero-emission transit, school, and truck fleets, we respectfully request the funding for infrastructure for these vehicles to be on a first-come, first-serve basis, similar to the Air Resources Board HVIP program and the Energy Commission's CaleVIP program for light-duty vehicles. This is particularly critical as



HVIP recently removed funding enhancements for infrastructure, increasing the burden on transit agencies to deploy zero-emission buses. By providing infrastructure funding on a first-come, first-serve basis, the Clean Transportation Funding program would provide the funding necessary to build out the associated infrastructure for zero-emission, battery-electric bus deployments. Within this program, Proterra recommends providing depot charger funding up to \$30,000 per DC fast charger that operates at rates from 50 kW to 100 kW, up to \$50,000 per DC fast charger that operates at rates greater than 100 kW up to 200 kW. For high power overhead charging at rates above 200 kW Proterra recommends up to \$100,000, which can provide fast charging either on-route or at the depot. Finally, the CEC should only provide funding to those chargers that utilize the J-1772 CCS standard for depot charging and the J-3105 standard for overhead high power charging.

Proterra appreciates the opportunity to provide feedback on the Energy Commission's initial proposed concepts for medium- and heavy-duty zero-emission infrastructure. We look forward to continuing to work together to deploy zero-emission vehicles and infrastructure.

Sincerely,

Kent Leacock

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