

DOCKETED

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sdap

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California Energy Commission 1515 Ninth Street
Sacramento, CA 95814

RE: Docket No. 19-TRAN-02.

Dear California Energy Commission Members:

On behalf of San Diego Airport Parking Company and Small business entities falling under CARB's measure of the Airport Shuttle Bus ZEV Regulation 19-16 that passed unanimously at the Board hearing on June 27, 2019. I submit these comments to address solicitation concepts for zero-emission buses (ZEBs) and supporting infrastructure deployment for a priority sector that has not been well supported to date; however, it faces the fastest and highest measures to date as this requirement for this vocation is 5 years earlier than Transit, plus it has a penalty. Our vocation has had not demonstrations projects and we average much higher miles than the average commercial vocations, we average 40,000 miles on our shuttles yearly and do not keep them past 5 years. We have no support by the VW mitigation program as it is only for buses 10 years and older. We have buses that are Class 2B and up and have had very little inventory choices. We need DCFC charging in order to keep the buses on the road beyond 200 miles and we are a perfect sector and application for ZEV technology as we run on fixed routes with speeds averaging 20 mph. Additionally, due to our application, we have the best opportunity to create a bench mark for the best fuel economy by a ZEV.

Additionally, we park thousands of customers cars daily that stay on average more than one day or more than 24 hours. This is another use case of EV charging that we need to support while supporting our transition into Fleet ZEV's.

There is great opportunity to manage our peak time use with fast charging and battery storage; but we need help. Small and private business entities are not getting the support required to make this transition successful.

What is the Zero-Emission Airport Shuttle Regulation and to whom does it apply?

The Zero-Emission Airport Shuttle Regulation, adopted in June 2019 by the California Air Resources Board, requires airport shuttle operators to transition to 100 percent zero-emission vehicle (ZEV) technologies. Airport shuttle operators must begin adding zero-emission shuttles to their fleets in 2027, and complete the transition to ZEVs by the end of 2035. The regulation

applies to airport shuttle operators who own, operate, or lease vehicles at any of the 13 California airports regulated under this rule (regulated airports) (Table 1).

Airport shuttles that meet each of the following conditions fall under the regulation:

• Shuttles operating at regulated airports in California.

• Shuttles with gross vehicle weight ratings (GVWR) of 8,501 lbs or greater, which transport passengers to, from, or around a regulated airport.

• Shuttles with fixed destination routes that may include stops at locations such as rental car facilities, on-airport or off-airport parking, hotels, or other tourist destinations. (A fixed destination route is a predetermined route that transports passengers between the same locations, although the number of stops along the route may vary.)

• Shuttles based or housed within 15 miles of a regulated airport that have round trip routes equal to or less than 30 miles.

What are the Zero-Emission Airport Shuttle Regulation requirements?

• After January 1, 2023, a fleet owner choosing to replace a ZEV in the existing fleet must replace it with another ZEV.

• Model year 2026 (and later) airport shuttles greater than 14,000 lbs (GVWR) must comply with the Zero-Emission Powertrain Certification Regulation.

• Reporting and record keeping requirements begin in 2022.

• Airport shuttle fleets must meet fleet ZEV requirements according to the compliance schedule in Table below.

Fleet ZEV Requirements

Compliance Deadline % of Fleet That Must Be

Zero-Emission

December 31, 2027 33%

December 31, 2031 66%

December 31, 2035 100%

Foothill Transit is the primary public transit provider in the Pomona and San Gabriel Valleys of eastern Los Angeles County. Since our first deployment of ZEBs in 2010, Foothill Transit has been a leader in zero-emission efforts. Today, we have 33 battery electric buses in operation and two more battery electric double deck buses slated to start service in Spring 2020. Although Foothill Transit is at the forefront of the state-wide electrification efforts, we are still learning a lot about ZEB technologies, and specifically how to scale our fleet. The most daunting challenge is the high cost of ZEBs and infrastructure, and the cost and complexity of electric utility rates for ZEB charging.

Foothill Transit relied heavily on programs such as Hydrogen and Battery Electric Vehicle Incentive Program (HVIP) to procure existing electric buses. On October 24, 2019, CARB voted to exclude infrastructure costs from HVIP qualifications.

This funding gap will make it more difficult for transit agencies to comply with CARB's Innovative Clean Transit (ICT) ruling, which mandates that transit agencies must transition to zero-emission bus fleets by 2040.

If you have any questions or concerns, please do not hesitate to reach out to me as SDAP has lots of data that we are willing to share. We look forward to continue working with the California Energy Commission.