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Proterra-Lion-Amply-Arrival-ABC-NRDC-CALSTART on Recovery-Reinvestment

Additional submitted attachment is included below.

May 18 , 2021

California Energy Commission
1516 9th Street
Sacramento CA, 95814

Sent to docket 21-TRANS-02.

Re: 21-TRAN-02 Recovery and Reinvestment Initiative

Dear Commissioners and staff:

The joint signatories below submit the following comments regarding the Pre-Solicitation Workshop for the California Energy Commission(CEC) Recovery and Reinvestment Initiative on April 12, 2021. We are writing to propose a targeted investment by the CEC, using half of the \$10 million budgeted for “Recovery and Reinvestment” from the Clean Transportation Program (CTP) funds while meeting the CEC request for creative financing. Specifically, we are proposing the Zero Emission Truck, Bus, and Infrastructure Finance (ZETBIF) program for public and private fleets that will effectively leverage CTP program funding, while creating economic activity and supporting jobs. The ZETBIF pilot proposal seeks to address the challenge of overcoming the high first costs of zero-emission trucks and buses and the accompanying infrastructure. The CEC would only provide seed money to the State Treasurer for a charging infrastructure loan loss reserve program and other sources of seed money would be for a State Treasurer loan loss reserve program for the cost of the ZETB.

The ZETBIF pilot program would also validate using Low Carbon Fuel Standard (LCFS) credits that fleets can earn, electricity and/or maintenance savings as part of the loan by the financial institution. The State Treasurer, similar to two existing programs today, would operate a loan loss reserve program in conjunction with financial institutions using seed money provided by the CEC and other funders. In addition, we propose the pilot be limited to with small and medium size fleets to address equity.

ZEV adoption faces the same challenge as energy efficiency: even with a decent payback on investment vs. a diesel vehicle, many public and private fleets cannot make the switch because their capital budgets may not allow them to cover the incremental cost difference between a conventional vehicle and a ZEV. In 2020 HVIP provided over 1200 M-HD-ZEV vouchers—but this likely represents only half of the demand for commercial ZEVs. In addition, there are transactional barriers for private banks to provide loans to fleets for relatively new technology, and we understand commercial ZEVs may be viewed as risky due to unknown residual value. We also believe this pilot, if successful, can be expanded to other light, medium and heavy-duty charging markets. Please contact Meredith Alexander at malexander@calstart.org with any questions.

Sincerely,

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