

*Comment Received From: Redding Area Bus Authority
Submitted On: 7/30/2024
Docket Number: 19-TRAN-02*

RABA's Comments

Additional submitted attachment is included below.



July 29, 2024

Ms. Michelle Vater
Supervisor, Freight and Transit Unit
California Energy Commission
715 P Street
Sacramento, California 95814

Re: Public Comment for California Energy Commission on ZEB Funding

Dear Ms. Vater,

On behalf of Redding Area Bus Authority (RABA) we write to provide comments regarding Docket #19-TRAN-02 (Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure).

Public transportation is the vanguard of the state's greenhouse gas reduction strategy and, through the ICT mandate, faces one of the most prescriptive and time-bound transitions to ZEV technology,

Yet state funding programs are not sufficiently incorporating the needs and challenges of transit with respect to zero-emission fleet conversion. To address these needs and support the state's ambitious ZEV goals, we urge you to consider including a solicitation concept specifically applicable to funding the incremental operating costs associated with zero-emission transit bus charging and refueling infrastructure projects. Based on the concepts presented in the July 16th workshop, there is no clear way for transit agencies to leverage CEC's funding programs to meet this urgent and near-term need, which we view as a missed opportunity.

The importance of operating funding for our agency and our peers cannot be overstated. Even without fleet transition as required by the Innovative Clean Transit regulation, we face challenges to long-term fiscal sustainability while maintaining full coverage and reliable service on existing routes, let alone expanding service to advance towards state ridership targets.

Without additional support and predictability for the incremental operating costs associated with fleet conversion, our plans to make long-term capital investments in zero-emission vehicles and infrastructure are at risk. Operating support for early public transit adopters is critical to kickstart the industry and unlock the capital investment that the CEC supports and advocates for while long-term efforts to reduce the costs of infrastructure and zero-emission fuel – particularly hydrogen – ramp up.

Additionally, we implore the CEC to reduce the burden for transit agencies posed by application requirements. These challenges are particularly acute for smaller agencies with fewer staff resources for responding to competitive solicitations. We suggest that the CEC consider options to reduce this burden for potential applicants who currently find the agency's application processes to be an unmanageable deterrent to engaging with the CEC's opportunities.

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For example, we would encourage the CEC to greatly enhance coordination with existing funding programs such as the Transit and Intercity Rail Capital Program and other programs administered by CalSTA, Caltrans, and the CTC such that transit agencies could access funds via a single, streamlined process. Alternatively, we would also encourage processes with greater certainty and predictability for applicants, such as a “first-come-first-served” process or increasing focus on recurring, multi-year programs.

We recognize the enormous challenges in this work and commend the CEC for its efforts and leadership in this area. We look forward to working with you and welcome the opportunity to discuss these comments further.

Sincerely,

A handwritten signature in black ink, appearing to read "John C. Andoh", enclosed in a thin black rectangular border.

John C. Andoh
Transit Manager
Redding Area Bus Authority

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