



June 29, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: Low Carbon Fuel Standard Proposed Amendments

Dear California Air Resources Board Staff,

Thank you for the opportunity to provide comments on ARB's draft Low Carbon Fuel Standard (LCFS) proposed amendments. Proterra strongly supports the LCFS and efforts to encourage the use and production of cleaner low-carbon fuels in California.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus and features on-route, fast-charge technology that offers functionally unlimited range, as well as an extended range version that enables transit agencies to travel up to 350 miles 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 moved our Corporate Headquarters to Burlingame, California from the East Coast and expanded manufacturing to the City of Industry, California —allowing future zero-emission buses deployed in California to be designed and manufactured by Californians and supported by California supply chains.

Proterra supports the proposed inclusion of section 95486.2, which would credit zero-emission fueling infrastructure based on station capacity, for both hydrogen refueling infrastructure (HRI) and DC fast charging infrastructure (FCI). This additional pathway will help incentivize deployment of zero-emission infrastructure, helping to implement the Governor's Executive Order B-48-18. Our specific comments within this section include:

1. Proterra respectfully requests expanding eligibility for zero-emission fueling based on station capacity for public fleets to help further spur zero-emission, battery-electric medium and heavy-duty DC fast charging infrastructure. This will help support the California Air Resources Board's efforts to accelerate the deployment of zero-emission public transit buses with the Innovative Clean Transit initiative, as well as zero-emission school buses and other medium- and heavy-duty zero-emission vehicle technologies for public fleets.
2. With the inclusion of public fleets, we recommend removing the requirement to support at least two of the qualifying commercial fast charging connectors. For public fleets, such as transit agencies or school districts, this requirement is not needed, as most fleets use a single technology and charging

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infrastructure, and additional connectors would be underutilized. In addition, we fully expect similar situations to arise in the light and medium duty sector so multiple connector deployment could limit charging capability for fleets and potentially the general public.

Thank you for the opportunity to provide comments on the Proposed LCFS Draft Regulation Order. We look forward to continuing to work together to help carry out the goals of the LCFS program.

Sincerely,

Kent Leacock

Kent Leacock
Sr. Director Government Relations & Public Policy
Proterra, Inc.

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