



February 18, 2019
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Zero-Emission Powertrain Certification Regulation

Dear Chair Nichols and Members of the California Air Resources Board,

We appreciate the opportunity to provide comments on the proposed Zero-Emission Powertrain Certification Regulation. Proterra supports adoption of the proposed regulation, which will provide manufacturers alternative pathways and flexibility to achieve powertrain certification, and help improve transparency, consistency, and stability in the heavy-duty electric vehicle market.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus with models that feature 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 up to 29 MPGe performance, 500%+ better than diesel and CNG buses, and has a lower total cost of ownership due to more simplified maintenance needs and lower operating costs. With no tailpipe emitting toxic diesel particulate matter, the Proterra Catalyst eliminates approximately 229,000 pounds of greenhouse gas emissions each year, and can save more than 2.5 million pounds of carbon emissions over the lifetime of the vehicle. Proterra also offers high power charging systems with a range of power levels that can easily scale as more battery-electric vehicles are added to a fleet, utilizing standardized technology that allows for interoperability.

Additionally, 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 intent and most of the components of the proposed Zero-Emission Powertrain Certification Regulation. The regulation would help reduce variability in the quality and reliability of HDEVs and HDFCVs, ensure information regarding HDEVs and HDFCVs and their powertrains are effectively and consistently communicated to purchasers, and accelerate progress towards greater vehicle repairability. Adding market transparency, consistency, and stability will help towards broad market adoption of zero-emission technology in the heavy-duty sector. We are thankful to ARB staff who have overseen the development of the plan and their efforts to work with many stakeholders to create the regulation.

As a leading manufacturer of zero-emission buses, Proterra will continue to manufacture reliable, safe, and quality heavy-duty zero-emission vehicles for fleet operators, bus drivers, maintenance staff, and public riders. We appreciate the opportunity to provide comments on this proposal.

Sincerely,

Kent Leacock

Sr. Director Government Relations & Public Policy
Proterra Inc.

www.proterra.com