



May 21, 2020

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Proposed Advanced Clean Truck Regulation 15-Day Changes

Dear Board Members and Staff,

Thank you for the opportunity to provide comments on the proposed 15-day changes to the Advanced Clean Truck Regulation (ACT). Proterra supports efforts to expand and accelerate deployment of medium- and heavy-duty zero-emission vehicles to further reduce greenhouse gas emissions from the transportation sector.

Proterra is a leader in the design and manufacture of zero-emission electric transit vehicles and EV technology solutions for commercial applications including electric school buses, electric coach buses and electric delivery trucks. . Proterra's Catalyst electric transit bus achieves up to 25 MPGe compared to a diesel bus and can deliver nearly twice the horsepower and five times better fuel efficiency than a standard diesel vehicle. Proterra electric buses have zero tailpipe emissions or pollutants, eliminating about 230,000 pounds of CO2 emissions annually for every diesel vehicle replaced. To date, Proterra has sold more than 950 transit buses to 120 customers in 43 U.S. states and Canada provinces. We 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.

Earlier this year, Proterra announced a collaboration with Freightliner Custom Chassis Corporation (FCCC), a subsidiary of Daimler Trucks North America and leading manufacturer of medium- and heavy-duty trucks, to develop an all-electric delivery truck chassis. The platform will feature a Proterra battery system with 226 kWh of energy capacity and an all-electric, zero-emission drive system.

Proterra supports the ACT and proposed 15-day changes to further support ZEV truck deployments. Specifically:

- Proterra supports changes to increase the early requirements to implement the rule at high levels in MY 2024 and moving forward.

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- Proterra also supports the proposed changes to increase requirements in later years and add continued ramping up past 2030. This will help establish a pathway to achieving the goals of a 15% ZE fleet by 2033 the 2045 carbon neutrality goal, as well as provide the needed market signals to help continue advance and commercialize zero-emission trucks.

Proterra has a long and successful track record of advancing zero-emission medium- and heavy-duty vehicle technology and meeting the demand of fleets transitioning from conventional to electric vehicles. Proterra is poised to further support medium- and heavy-duty truck transportation electrification in California and appreciated the Air Board's efforts to develop an aggressive and achievable regulation.

Thank you for the opportunity to provide comments on the proposed 15-day changes to the Advanced Clean Truck Regulation. We look forward to continuing to work together to help carry out the goals of this program.

Sincerely,

Brittany Caplin  
Director, Government Relations, Proterra

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