



June 28, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Innovative Clean Transit Regulation

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

We appreciate the opportunity to provide comments on the Innovative Clean Transit (ICT) proposed regulation. We strongly support adoption and implementation of a robust ICT rule and applaud the actions of the California Air Resources Board to meet California's important air quality goals and the state's leadership to address climate change. We support efforts to deploy zero-emission vehicles that are accessible to all Californians and that eliminate toxic emissions and associated exposures from diesel and conventional natural gas buses.

Proterra designs and manufactures one of the world's most fuel-efficient battery-electric buses and features on-route, fast-charge technology that offers continuous service on busy transit routes, as well as an extended range version that has a nominal range of up to 350 miles on a single charge. Proterra's CATALYST™ bus can achieve 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions. Proterra is headquartered in Burlingame, California and has expanded manufacturing operations in both Burlingame and the City of Industry, California — allowing future zero-emission buses deployed in California to be designed, engineered, tested, and manufactured by Californians and contributing to the California economy.

Proterra strongly supports the proposed Innovative Clean Transit rule. The proposed rule is a balanced approach that will allow transit agencies sufficient time to plan and procure zero-emission transit buses, while maintaining the goal of transitioning to 100% zero-emission vehicle procurement by 2040. We are thankful to CARB staff who have overseen the development of the plan and their efforts to work with many stakeholders to create a reasonable regulation.

As a leading manufacturer of zero-emission buses, Proterra will continue to innovate and implement strategies to make battery-electric buses the most cost competitive and fuel efficient choice for transit agencies and improve our technology to make battery-electric transit options the number one of choice of transit agencies, bus drivers, maintenance staff, and public transit riders alike. Since 2010, Proterra has decreased the up-front cost of battery-electric transit buses by approximately 41% (from \$1.2M to \$700K) and increased range by approximately 800% (from a nominal range of 30-50 miles to 250-350 miles). To remain

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competitive both in California and throughout the United States, we will continue to be cost competitive and improve our technology to accelerate the deployment of zero-emission buses in California and beyond.

Our comments on the draft Innovative Clean Transit proposed regulation include:

- We recognize that there may be a few isolated routes that current zero-emission technology may not be able to serve. We support a waiver process to allow agencies defer zero-emission bus purchase requirements due to an inability to meet mileage needs, but we strongly recommend that this be limited strictly to vehicles serving those routes or duty-cycles.
- We strongly support continued funding of incentive programs, such as HVIP, to assist the transition to 100% zero-emission throughout the transition period.

Thank you for the opportunity to provide comments and we look forward to working with CARB and other stakeholders in implementation of the ICT.

Sincerely,

Kent Leacock

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