



November 14, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: FY 22-23 Low Carbon Transportation Funding Plan

Dear California Air Resources Board Members and Staff,

Proterra appreciates the opportunity to comment on the FY 2022-2023 Low Carbon Transportation Funding Plan. Proterra appreciates the significant investment allocated in this year's budget for the advancement of clean transportation and prioritization of zero-emission vehicles (ZEV) and ZEV infrastructure incentives and the proposed allocation within the LCT Funding Plan.

Proterra is a leader in the design and manufacture of zero-emission electric transit vehicles and electric vehicle (EV) technology solutions for commercial vehicle applications. With more than 10 years of experience delivering heavy-duty electric transit vehicles, Proterra has sold over 1,300 battery electric zero emission buses to transit agencies across 43 U.S. states and Canadian provinces. With more than 135 customers, our vehicles have delivered over 30 million service miles and avoided over 150 million pounds of CO₂ emissions. Proterra has entered into partnerships to develop or supply battery systems multiple equipment manufacturers (OEM) powering zero-emission electric delivery vehicles and work trucks, semitrucks, construction and mining equipment, port container handlers and forklifts, school and coach buses, and low-floor cutaway shuttles.

Proterra strongly supports the proposed heavy-duty and off-road investments included in the Low Carbon Transportation funding plan. Specifically, Proterra supports the proposed \$1.7 billion for HVIP, including \$265 million for standard HVIP, \$70M for public transit, \$130M for school buses in small and medium air districts, and over \$1.2 billion for the LEA School Bus Replacement Program. This funding will help fleets accelerate the introduction and deployment of zero-emission technologies to meet California's long-term air quality, carbon neutrality, petroleum reduction, and climate change goals. This includes the goal of having 100 percent of sales of new passenger vehicles and trucks in the state be zero-emission by 2035, and all drayage trucks be zero-emission by 2035. This will also help fleets comply with regulations requiring the transition to zero-emission, including the Innovative Clean Transit Rule, Airport Shuttle Regulation, and Advanced Clean Fleet rule.

In terms of potential policy changes to the HVIP program, Proterra supports staff's proposal to exclude public fleets from the potential fleet size limits for 2023. We also

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strongly support maintaining the public transit set-aside. We recognize there has been a slower pace of voucher requests for public transit buses, however transit agencies' have lengthy procurement cycles that don't always align with HVIP reopening. We encourage ongoing support and set-asides for public transit so that agencies can access funds as they complete the procurement process.

Proterra appreciates the opportunity to provide feedback and support for ARB's FY 22-23 Low Carbon Transportation funding plan update. We look forward to continuing to work with ARB and other stakeholders to accelerate the deployment and commercialization of zero-emission heavy-duty vehicles and infrastructure.

Sincerely,

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