



September 14, 2018
California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Innovative Clean Transit Proposed Regulation

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

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 further 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 is a leading U.S. manufacturer of one of the world's most fuel-efficient battery-electric buses for public transit. Our industry leading CATALYST™ bus can achieve 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and NOx emissions from American cities. Proterra manufactures its own battery modules and packs in Burlingame, CA, and builds transit buses from the ground up in two U.S. factories, including in the City of Industry, CA. Proterra moved its Corporate Headquarters to Burlingame from the East Coast and expanded manufacturing to LA County - allowing future zero-emission buses deployed in California to be designed and manufactured by Californians and supported by California supply chains. To date, Proterra buses have logged over 5.5 million miles in revenue service, providing transit agencies reliable and improved performance.

Proterra strongly supports the draft Innovative Clean Transit proposed regulation. 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 by 2040. We are thankful to ARB staff who have overseen the development of the plan and their efforts to work with many stakeholders to create a reasonable regulation.

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 preferred 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 competitive both in California and throughout the United States, we will

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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 some transit agencies have a few very long duty cycles that current technology cannot service. In our experience, these bus routes remain an outlier to the vast majority of routes that can be serviced today by electric transit. We support the ability to defer zero-emission bus purchase requirements due to the inability to meet isolated mileage needs, but this should be limited strictly to vehicles serving those duty-cycles. We strongly recommend that exemptions or deferrals do not apply to an entire agency, if only a few duty cycles cannot be serviced by zero-emission technology.
- We strongly support continued funding of incentive programs as available through the life of the regulation. Programs such as HVIP are essential to assist the transition to 100% zero-emission.

Thank you for the opportunity to provide comments and we look forward to working with ARB and other stakeholders during implementation.

Sincerely,

Kent Leacock

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