



December 15, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95815

Re: Appendix C: Volkswagen's Zero Emission Vehicle Investment Commitment Development Process and Investment Areas

Dear California Air Resources Board Members and Staff,

Thank you for the opportunity to provide comments on Volkswagen's (VW) zero emission vehicle (ZEV) investment commitment development process and investment areas for California. Proterra strongly supports the investment in ZEV vehicle and infrastructure deployment, which will help reduce toxic particulate matter and greenhouse gas (GHG) emissions. Proterra looks forward to working with ARB and VW to increase ZEV awareness and provide ZEV access to all California communities.

Proterra designs and manufactures the world's most fuel-efficient battery electric bus and features on-route, fast-charge technology that offers functionally unlimited range, as well as an extended range version that enables transit agencies to travel 350 miles on a single charge. Proterra's CATALYST™ bus achieves 22+ MPGe performance, 500%+ better than diesel and CNG buses, eliminating toxic diesel particulate matter and reducing carbon emissions by 70% or more compared to CNG or diesel buses. Proterra recently moved its 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.

Zero-emission public transit buses are ripe for immediate scaling and investment from the California ZEV Investment Plan to help carry out VW's primary activities to increase usage of ZEV technology and ARB's goal to accelerate the adoption of zero-emission advanced heavy-duty technology. The Volkswagen settlement provides a much-needed opportunity to further demonstrate that commercially available zero-emission technologies have the lowest cost of ownership, improved maintenance and performance, and better serve a diverse range of communities' public transit needs, including the reduction of GHG and the elimination of criteria emissions.

Transit buses have consistently been the forerunners in advancing heavy-duty transportation technology and transferring lower-emission technology throughout the heavy-duty, class-8 sectors. This technology progression has evolved from CNG buses with lower emissions to battery electric buses with zero emissions. Zero-emission transit buses provide the opportunity for everyone to ride an electric vehicle and realize the health and other associated benefits, including eliminating toxic diesel emissions in disadvantaged communities. As part of the VW Investment Appendix C in California, we strongly support the plan for significant investment in ZEV public awareness and infrastructure to accelerate the deployments of electric transit buses throughout California. Proterra's specific comr

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- We strongly support the inclusion of zero-emission public transit buses in order to accelerate the adoption of zero-emission technologies to help ARB implement the proposed Advanced Clean Transit Rule and achieve its air quality and greenhouse gas reduction goals.
- We also strongly support the inclusion of charging infrastructure for medium- and heavy-duty fleets in order to support and advance the use of ZEVs, and respectfully request inclusion of charging stations for fleets that serve the public, such as transit agencies or municipal vehicles, as an eligible use. ZEV infrastructure investments can significantly assist transit agencies and cities in overcoming the initial barriers to ZEV adoption and overall transportation electrification.
- We applaud the inclusion of a Green City project to achieve impacts across multiple vehicle sectors and strongly support including zero emission transit within the proposed project and allocating funding for zero-emission transit in all four investment plans over the next ten years.

Thank you for the opportunity to provide comments on Appendix C. We look forward to continuing to work together to help carry out the goals and initiatives included in the ZEV Investment Commitment and Environmental Mitigation Trust.

Sincerely,

F. Kent Leacock

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