

**BEFORE THE PUBLIC UTILITIES COMMISSION OF
THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Alternative-Fueled Vehicle Programs,
Tariffs, and Policies

Rulemaking R.13-11-007

**OPENING COMMENTS OF PROTERRA INC ON THE
OIR TO CONSIDER ALTERNATIVE-FUELED VEHICLE
PROGRAMS, TARIFFS, AND POLICIES**

December 12, 2013

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**OPENING COMMENTS OF PROTERRA INC ON THE
OIR TO CONSIDER ALTERNATIVE-FUELED VEHICLE
PROGRAMS, TARIFFS, AND POLICIES**

Pursuant to Rules 14.3 and 14.6 of the Commission’s Rules of Practice and Procedure in Proceeding 13-11-007, Proterra Inc respectfully submits these *Opening Comments of Proterra Inc on the OIR to Consider Alternative-Fueled Vehicle Programs, Tariffs, and Policies*.

Our major points are:

- We support the proposed scope of the OIR to consider establishing tariffs for specific heavy-duty fleet applications and the potential creation of state financing programs.
- Specifically, we strongly support establishing predictable and uniform statewide rate structures that fully recognize the public benefits offered by deploying zero-emission, fast-charge public transit buses that continuously operate with functionally unlimited range—eliminating mobile source smog precursors and toxic particulate pollution and avoiding associated localized exposure for highly impacted communities throughout California.
- We support the elimination of demand and time of use charges, as it will help further deploy zero-emission buses and provide substantial greenhouse gas emission reductions needed to achieve the long-term goals of AB32 and help carry out Governor Brown’s Executive Order ZEV Action Plan.
- We request the Commission adopt favorably lower rates for zero-emission public bus transit that are comparable to other forms of electrified transportation in

California, such as MUNI, light rail, and BART, as it will help encourage adoption of zero-emission, fast-charge public transit buses that will provide lasting statewide environmental and public health benefits.

- We also support the proposed inclusion of financing programs to help public transit agencies realize the ongoing fuel and maintenance cost-savings provided by all-electric, fast-charge buses that currently offer the convenience to be 1-to-1 replacements for conventional CNG and diesel buses.

We appreciate the opportunity to provide comments on the OIR to Consider Alternative-Fueled Vehicle Programs, Tariffs and Policies, and look forward to working with the CPUC to help accelerate deployment of advanced vehicle technologies to clean the air and reduce California's dependence on petroleum-based transportation fuels.

Respectfully Submitted,

/s/ Eric McCarthy

Dated: December 12, 2013

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