

Request for Information (RFI)

Connecticut Clean School Bus (CSB) Program

June 20, 2022

Action:

Interested parties to this Request for Information (RFI) are invited to respond to any or all of the questions in this document, through which the Connecticut Department of Energy and Environmental Protection (CT DEEP) is seeking input on the development of a Clean School Bus Program matching grant program.

Summary:

On May 10, 2022, Governor Lamont signed Public Act (PA) 22-25 (Act), An Act Concerning the Connecticut Clean Air Act. Section 13 of the Act requires DEEP to establish and administer a grant program to provide matching funds necessary for municipalities, school districts, and school bus operators to submit applications to the U.S. Environmental Protection Agency's (EPA) Clean School Bus grant program in order to maximize federal funding for the purchase or lease of zero emission school buses and electric vehicle (EV) charging infrastructure associated therewith. The Act allows the Commissioner to establish the means for application and funding levels for the match grant program. Additionally, the Act requires DEEP to provide administrative and technical assistance to municipalities, school districts, and school bus operators transitioning to using zero emission school buses, applying for federal grants for such buses, and installing EV charging and fueling infrastructure for such buses.

Purpose:

To inform its electric school bus (ESB) support efforts as required by the Section 13 of the Act, CT DEEP is issuing this RFI in order to obtain data and feedback on ESB and associated charging infrastructure project costs, with a focus on better understanding where anticipated project costs may exceed the funding amounts provided by EPA Clean School Bus grant outlined in EPA's 2022 Clean School Bus (CSB) Rebates Program Guide. CT DEEP also seeks to identify any additional financial burdens or other barriers to the implementation of ESB projects. This RFI is intended to solicit information on: (1) potential opportunities and challenges for implementing EPA's Clean School Bus Program, (2) suggestions on how CT DEEP can provide assistance to municipalities, school districts and school bus operators applying for federal grants to transition to the use of zero-emission school buses and (3) information on actual costs for ESBs, associated charging infrastructure equipment, and labor and installation cost for electric vehicle supply equipment (EVSE).

Connecticut Air Quality and Impacts of School Buses on Health and Environmental Effects:

Connecticut fails to meet both the 2008 and 2015 ozone National Ambient Air Quality Standards (NAAQS). EPA is in the process of reclassifying Connecticut as being in "severe" non-attainment for the 2008 ozone standard in Fairfield, New Haven and Middlesex counties. The 2018 Connecticut GHG Emissions Inventory, issued by CT DEEP in 2021, determined that Connecticut is not on track to meet its 2030 and



2050 Global Warming Solution Act targets and must reduce transportation emissions by roughly one-third in this decade. The transportation sector is responsible for over 67% of NOx emissions, an ozone-related precursor, in Connecticut and is the single largest contributor to GHG emissions—largely from internal combustion engine vehicle exhaust. Failing to meet these health-based standards has subjected generations of Connecticut residents to adverse health and economic impacts. Connecticut cities frequently rate as some of the toughest to live in for people with asthma. To attain the ozone standards, Connecticut needs emission reductions from the transportation sector. The State must reduce GHG emissions from the transportation sector to achieve Connecticut's economy-wide GHG reduction targets of at least 45 percent below 2001 levels by 2030, and 80 percent below 2001 levels by 2050, as required by the 2018 Act Concerning Climate Change Planning and Resiliency.

School buses collectively travel over three billion miles each year, providing transportation to and from school for more than 25 million American children every day. Connecticut has approximately 7,896¹ school buses in operation across the state. Nearly all the school buses currently on the road run on diesel fuel, with some of those buses still lacking modern emission control technologies because they pre-date EPA's most recent emission standards. Exhaust from these buses has a negative impact on human health, especially for children who have faster breathing rates than adults and whose lungs are not yet fully developed. CT DEEP has had early successes in supporting the adoption of electric school buses through use of Volkswagen (VW) Settlement funds, including dedicating over \$9.6 million to replace forty-four diesel school buses with new electric school buses operating in seven environmental justice communities. The EPA's Clean School Bus Rebates will fund the replacement of existing school buses with cleaner buses that result in better air quality on the bus, in bus loading areas, and throughout the communities in which they operate.

Federal and State Program Targets:

The federal Infrastructure Investment and Jobs Act, Public Law 117-58 (IIJA) amends the federal Clean School Bus Program under Section 741 of the Energy Policy Act of 2005 (42 U.S.C. 16091) and provides \$5 billion for the replacement of existing school buses with clean and zero-emission (ZE) school buses. For each fiscal year between 2022 and 2026, \$500 million is available to fund zero emission and clean school buses, and \$500 million is available to fund exclusively zero-emission school buses. EPA is offering a minimum of \$500 million through the 2022 Clean School Bus Rebates for zero emission and low-emission school bus rebates as the first funding opportunity. The first grant solicitation opened on May 20, 2022, and closes on August 19, 2022.

The recently passed Connecticut Clean Air Act, Public Act (P.A.) 22-25² (Act) sets targets for the transition to zero-emission vehicles in state and school bus fleets across Connecticut. Specifically, Section 13 of the Act requires:

¹ DEEP compiled a CT School Bus Inventory from CT DMV data on September 30, 2021. Out of the 7,896 school buses operating in Connecticut, 1,498 are classified as Class 1-3 short/medium school buses and 6,398 are full size Class 4-8 school buses.

² Public Act 22-25: An Act Concerning the Connecticut Clean Air Act, https://www.cga.ct.gov/2022/ACT/PA/PDF/2022PA-00025-R00SB-00004-PA.PDF



- 100% of school buses that serve school districts entirely within an environmental justice community or at least one environmental justice community as of July 1, 2022 to be zero emission by 2030,
- 100% of school buses to be zero emission or alternatively fueled vehicles by 2035,
- 100% of school buses to be zero emission vehicles by 2040,
- CT DEEP to provide administrative and technical assistance to school districts to transition to ZEV buses and
- CT DEEP to establish a matching grant program for school districts to supplement the EPA's Clean School Bus program.

RFI Questions:

To inform its ESB support efforts as required by the Section 13 of the Act, CT DEEP is seeking information on several questions. While all information and views are appreciated, CT DEEP encourages commenters to provide the following information:

- 1. Are you planning on applying for EPA's first round of Clean School Bus Program funding?
 - i. If you are not interested in applying for this first round of funding, will you apply for a future round?
 - ii. If you aren't ready to apply, what barriers do you feel exist? What additional information or technical assistance measures would help to resolve these barriers?
- 2. If you plan to apply, what financial barriers exist for project completion? What non-financial barriers exist?
- 3. If you are a school bus provider, have you contacted your local school district regarding the federal funding opportunity? If you are a school district, have you contacted your local school bus provider about applying for EPA's first round of Clean School Bus funding?
- 4. Who is your electric distribution company and have you contacted them about transitioning to an electric school bus fleet? Do you have any concerns about the process of charging or working with your respective utility provider to install and manage an electric fleet?
- 5. As a school district, have you evaluated any sites to determine their suitability for charging infrastructure?
- 6. What would be the best use of matching funds for a potential project? Remaining cost of vehicle? EVSE installations? Behind the meter costs?
- 7. How many electric school bus projects are you anticipating there to be for your fleet per year for the next 5 years?
- 8. Please provide any information you have on electric school bus cost by class.
- 9. What type of charging (Level 1, 2 or DCFC) are you planning on installing?
- 10. If you were awarded a grant application or completed an electric school bus project in Connecticut or any jurisdiction within the past three years, please provide any actual or anticipated cost data and information on any grants provided for such projects. All or part of this information may be designated as confidential business information under the Connecticut



Freedom of Information Act as trade secret information in accordance with section 1-210(b)(5) of the Connecticut General Statutes, see section on Confidentiality below.

Other questions: Please provide any other comments or suggestions that may assist CT DEEP in implementing a Clean School Bus Program in Connecticut.

Deadline:

CT DEEP will accept responses on the questions by July 11, 2022. Responses should be emailed to DEEP.mobilesources@ct.gov with the subject "Response to Clean School Bus Request for Information".

Additional Information:

Confidentiality:

If a Respondent wishes to submit commercially sensitive or financial information to the Department that is of a confidential nature, please recognize that the Connecticut Freedom of Information Act governs the public's access to information. This law generally requires the disclosure of documents in the possession of the State upon request of any citizen, unless the documents are specifically exempt from disclosure. An example of an exemption is a "trade secret" as defined by section 1-210(b)(5) of the Connecticut General Statutes. Information claimed as confidential must be isolated from other material in the Respondent's submission and labeled "CONFIDENTIAL." Respondents must also provide the legal basis for a confidentiality claim, describe what efforts have been taken to keep the information confidential, and provide whether the information sought to be protected has an independent economic value by not being readily known in the industry. With your legal support and reasonable justification for confidentiality as described herein, the Department is better equipped to safeguard your confidential information should it become the subject of a Connecticut Freedom of Information Act inquiry.

Contact for Further Information:

Paul Kritzler
Supervising Air Pollution Control Engineer
CT Department of Energy and Environmental Protection
Mobile Sources Group
Paul.Kritzler@ct.gov