



Alameda-Contra Costa Transit District

Michael Hursh, General Manager

August 24, 2020

Genevieve Shiroma, Commissioner  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 95814

Re: CPUC Microgrids and Resiliency Rulemaking (R. 1909009)

Dear Commissioner Shiroma,

AC Transit is the largest bus-only transit agency in California. It serves the San Francisco East Bay, carrying 53 million people in FY 2018-19. I am writing to you and your fellow Commissioners regarding the rulemaking on microgrids and resiliency (R.1909009). We strongly encourage the Commission to create regulations and tariffs that facilitate access to all microgrid technologies and configurations.

Since 2000, AC Transit has been building the most comprehensive zero emission bus (ZEB) program in the United States, initially focused on hydrogen fuel cell electric bus (FCEB) technology, but we have recently begun integrating battery-electric buses (BEB) into our fleet. This investment in this zero emission technologies has allowed us to reduce our carbon footprint, improve air quality, and to save money. While we have been able to accomplish these benefits, the transition has also put us at the mercy of the whims of the grid. Since 2007, when we recognized the value of onsite generation, we've built up approximately 1.85 megawatts of capacity between four photovoltaic arrays and two stationary fuel cell energy servers. This does not provide for all of our energy needs, but it does put us on course to become more resilient, particularly as we rely upon more electricity as a fuel.

We ask that you design regulations and tariffs that enable public transit agencies like ours increased access to these proven resilient and clean technologies. Access to microgrid technologies such as fuel cells that are powered by natural gas and biogas are becoming more critical as our resiliency needs increase as we face increased grid outages due to wildfires and other catastrophic events.

Thank you for your consideration and your work to ensure equitable solutions to power our communities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Hursh'.

Michael Hursh  
General Manager

cc. Marybel Batjer, President, California Public Utilities Commission  
Martha Guzman-Aceves, Commissioner  
Liane M. Randolph, Commissioner

Clifford Rechtschaffen, Commissioner