ZETA | ZERO EMISSION TRANSPORTATION ASSOCIATION

April 6, 2026

United States Environmental Protection Agency
Office of Air and Radiation
Office of Transportation and Air Quality
1200 Pennsylvania Avenue NW
Washington, DC 20004

RE: EPA-HQ-OAR-2025-1806
Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Programs

Submitted via Rulemaking Portal: http://www.regulations.gov.

The Zero Emission Transportation Association (ZETA) is an industry coalition that represents the domestic electric vehicle (EV) and battery energy storage supply chain end-to-end, including raw and processed critical mineral and material producers, cell and battery manufacturers, vehicle manufacturers, charging companies, EV supply equipment (EVSE) providers, utility companies, and battery recyclers.

As a coalition, ZETA advocates for policy solutions that will unleash the full potential of American industry to compete globally, counter market dominance from adversarial nations such as China, and lead in next-generation vehicle manufacturing. Our companies are proud to invest in the United States by opening facilities across the country, creating American jobs, and onshoring manufacturing processes for a range of advanced technologies, including electric school buses. ZETA would like to express our appreciation to the Trump Administration for the opportunity to provide comment on EPA-HQ-OAR-2025-1806, "Development of Guidance for Alternative Fuel Vehicles and Fueling Infrastructure Deployment Under the Clean School Bus Funding Programs" ("The RFI").

Success of Electric School Buses in the Clean School Bus (CSB) Program

The Infrastructure Investment and Jobs Act (IIJA) allocated $5 billion in grants, rebates, and contracts over a five-year period (FY22-26) through competitive grants and rebates to replace existing diesel fuel school buses with alternative fuel or zero-emission models. Electric School Buses (ESBs) are currently the most in-demand option for school bus fleets applying for CSB program funding. Under the CSB program, the vast majority of applicants chose (as the program

is entirely voluntary) to request funding for ESBs. Electric school bus technology has been so popular under the program that ESBs account for 91% of buses selected by applicants.[1] This demand signals that electric buses are not merely one option among many, but rather the preferred pathway for fleet modernization and diesel replacement. The popularity of ESBs is based on their reliability, reductions in total cost of ownership (TCO) for users, and next-generation technology. Moreover, in today's marketplace, ESBs are the only zero-emission school buses available for purchase.

Today, there are over 5,000 electric school buses on the road in 49 states, DC, Puerto Rico, American Samoa, and over 20 tribal nations. The geographic diversity of participating districts further underscores the technology's viability. Electric school buses are being deployed in urban, suburban, and rural contexts, demonstrating adaptability across different operational environments. Electric buses are no longer confined to pilot programs; they are being integrated into active fleets across the country. This shift from demonstration to implementation marks a critical milestone in technology adoption. The Government Accountability Office's (GAO) site visits and stakeholder interviews confirm that electric school buses are functioning effectively in real-world conditions. School districts reported successful integration into daily operations, indicating that the technology is sufficiently mature for routine use.[2]

Benefits and Costs Savings of ESB Technology

ESBs provide a range of ancillary economic, operational, and energy system advantages that materially strengthen their value proposition, in addition to reducing vehicle emissions. These benefits extend beyond the transportation sector and position electric buses as multi-functional public assets.

Lower Total Cost of Ownership

Although ESBs typically entail higher upfront capital costs than diesel buses, deployment data indicate that they offer meaningful lifecycle cost advantages, particularly when evaluated on a total cost of ownership basis. Fueling costs, for example, are generally lower and more predictable for ESBs compared to diesel-powered buses. Electric buses operate on electricity rather than diesel fuel, resulting in substantially lower and more stable energy costs. Electricity prices are generally less volatile than diesel fuel prices and can be further optimized through time-of-use rate structures and managed charging strategies (e.g., off-peak charging). These dynamics allow school districts to reduce exposure to fuel price volatility, which has historically been a significant budgetary risk.[3]

[1] GAO Report to the Committee on Environment and Public Works. "Diesel School Bus Alternatives: Opportunities to Better Assess Progress of Federal Programs." June 2025. https://www.gao.gov/assets/gao-25-106887.pdf
[2] *Id.*
[3] *Id.*

Additionally, electric buses have fewer moving parts than internal combustion engine vehicles and do not require oil changes, exhaust system maintenance, or complex transmission servicing. As a result, districts report lower routine maintenance costs and reduced downtime, improving fleet reliability and operational efficiency, and resulting in a lower total cost of ownership.[4] The combination of lower fuel and maintenance costs contributes to more predictable operating expenses over time. For public school systems operating under fixed or constrained budgets, this predictability is a significant advantage, enabling more accurate long-term financial planning.

Energy System Integration and Grid Services

Electric school buses also present a unique opportunity to function as distributed energy resources within the broader electric grid, creating value beyond transportation. ESBs are the only school bus technologies capable of contributing to the electric grid.

For example, with bidirectional charging infrastructure, electric buses can discharge stored electricity back to the grid (vehicle-to-grid) and provide power directly to school buildings or facilities (vehicle-to-building).[5] Because school buses are typically idle for large portions of the day—particularly outside of morning and afternoon routes and during the summer—they are well-positioned to provide grid services during peak-demand periods. Aggregated fleets of electric school buses can also help utilities by reducing peak load demand, balancing intermittent renewable generation, and deferring or avoiding costly grid infrastructure upgrades. This capability is increasingly valuable as states and utilities seek to address increasing electricity demands. Electric buses can also serve as mobile energy storage units, providing backup power during outages.

These capabilities position electric school buses as dual-use infrastructure assets that support both transportation and grid modernization, aligning with broader federal and state energy policy objectives. ZETA urges the EPA to continue prioritizing funding for ESBs and related charging infrastructure to meet the strong demand from schools across the country.

Lack of Availability of Other Alternative Fuel School Buses

In addition to being in high demand, ESBs are the only zero-emission school bus technology readily available for purchase. The RFI requests comment on liquified natural gas and hydrogen school buses; however, there are no manufacturers that currently produce buses using those technologies.[6] By comparison, there are 21 manufacturing facilities across 13 states involved in ESB production. ESBs are built in facilities in states across the country, including North Carolina, Michigan, Indiana, West Virginia, New York, Kansas, Georgia, and Ohio, among others—creating thousands of jobs and delivering real economic benefit to local economies,

[4] Id.
[5] https://electricschoolbusinitiative.org/all-about-managed-charging-and-vehicle-everything-or-v2x.
[6] https://stnonline.com/news/epa-seeks-to-expand-fuel-scope-of-clean-school-bus-program/.

school districts, and students.[7] Spurred by investment in the CSB program, ESB demand has created domestic manufacturing jobs across the country. Companies like GreenPower Motor Company have invested in ESB technology and in turn, created a growing source of domestic manufacturing jobs to produce these next-generation vehicles. For example, GreenPower Motor's electric school bus production facility in South Charleston, West Virginia has generated positive economic development for the state and created good-paying manufacturing jobs.

Electric School Buses Are Best for School Districts and Taxpayers

The United States has a robust fleet of nearly 500,000 school buses that serve students and communities across our nation.[8] The CSB program should continue to meet the needs of these Americans, ensuring that alternative fuel solutions receive the funding appropriated by Congress to replace existing diesel-powered school buses with alternative fuel and zero-emission models.

Given the success of ESBs across the country, strong school district demand, lower total cost of ownership, energy system integration benefits, and lack of other zero emission school bus technology in today's marketplace, ZETA urges EPA to continue funding opportunities for ESBs under the Clean School Bus Funding Program. We look forward to continued engagement with EPA on how to advance funding opportunities for these next-generation vehicles and provide school districts with the numerous benefits they provide.

Sincerely,

Albert Gore
Executive Director

[7] https://electricschoolbusinitiative.org/electric-school-bus-manufacturing.
[8] https://electrificationcoalition.org/schoolbus/.