

Response to Request No. 1

Phoenix did not design, manufacture, test, nor install the subject battery modules/battery packs. Phoenix has a form of the updates attached as "PRODUCTION DATA RQ25001.xlsx" in the data room. The information contained therein came from Proterra with Phoenix providing updates to this data as needed. As best as Phoenix can determine, the subject recall was initiated, organized and run by Proterra and their management team. The battery designer, manufacturer and/or supplier, which Phoenix believes to be Proterra, or its successor entity, may be able to assess this issue further.