

Response to Request No. 13

Phoenix believes Proterra sent, or caused to be issued, certain letters relating to the software remedy from approximately Nov 7, 2023 to Nov 14, 2023. Phoenix believes the letters went to approximately 48 customers of Proterra at the time. The remedy information would likely be contained in those letters but Phoenix believes each Proterra letter would have contained the following remedies: a) Owners Letter, b) a list of affected VINs, c) a copy of the Repair Procedure, and d) a copy of Proterra EV Battery Safety Guide.

Phoenix does not have any copies of such letter(s) in its possession, custody or control.