

1. State, by model and model year, the number of subject vehicles Phoenix has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Phoenix, state the following:

- a. Vehicle identification number (17-character VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Subject component part number and design version installed as original equipment;
- f. Date of manufacture (MM/DD/YYYY);
- g. Date warranty coverage commenced (MM/DD/YYYY);
- h. Date of recall remedy completion (MM/DD/YYYY);
- i. Repair facility where the recall remedy was completed;
- j. How many battery packs the vehicle had;
- k. The location of the battery packs (i.e., floor or roof); and
- l. The State in the United States where the vehicle was originally sold or leased, or delivered for sale or lease (postal abbreviation).

Provide the table in Microsoft Excel, or a compatible format, entitled "PRODUCTION DATA." A pre-formatted data collection file, which provides further details regarding this submission, can be provided to you.

#### 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.