



June 26, 2025

Tom's Truck Center is a commercial truck dealership which has been in business in Orange County and Los Angeles since 1949. We are an HVIP dealer and support (5) zero-emission medium-heavy duty OEMs with (20) ZEV models/configurations and (2) zero-emission technologies, both BEV and Fuel Cell technology (FCEV).

I would like to set up a meeting with your team to discuss our concerns over the proposed HVIP rebate table that HVIP intends to implement by the end of this month or next month.

See below proposed HVIP voucher table, these lower rebate amounts will impact future HVIP zero emission sales, especially for Fuel Cell technology or small size fleets and owner operators in Class 4-6.

FUEL CELL TECHNOLOGY:

Specifically, FUEL CELL technology is not a mature technology and currently has only (2) OEMs listed in HVIP (HYUNDAI & New Flyer). In addition, New Flyer produces both BEV and FCEV. However, Hyundai has zero vouchers submitted in HVIP.

This technology requires more OEMs and more sales to penetrate the market which has no near-term scalability to support being affordable in the future including by large size fleets which will consider combining early adoption when incentives drive the cost to parity over a diesel. In addition, the long-term Heavy-Duty truck market & Drayage need a diesel truck zero emission replacement technology which is suited for heavier applications.

Fuel cell trucks and hydrogen fueling expansion is a solution; however, the technology is dependent on an increased number of units in operation to get the technology closer to maturity and affordability. Without volume the technology cannot scale and move closer to full market readiness. The technology requires fleets and drivers to adopt and spur growth, which progress needs consistent incentives and assistance to reduce any barriers for full maturity.

Clean Transportation Funding plans were approved by the CARB Board for Fiscal Years 2021 to 2025 which states that entities purchasing new-to-market technologies, such as fuel cell vehicles, will not be subject to the fleet size limits until the technology has achieved a higher degree of market penetration, meaning fleets of any size can continue to purchase fuel cell vehicles through HVIP.

BEV CLASS 4-6 INCENTIVES:

In addition, the proposed small business voucher amounts at Class 2b-6 do not support the feedback from small fleets and owner operators who indicated, and which CARB staff inserted their comments into the 2022-2023 Funding Plan at page 139. Staff shared that voucher amounts at that time were not currently high enough to enable small fleet and owner operators to purchase a zero-emission truck. As small fleets often have limited available capital, the higher purchase price of ZEVs often play an outsized role in their purchase decisions. Staff also indicated in the 2023-2024 Funding plan on 11-16-23 at page 76, that one of the key lessons learned is that small fleets need continuous access to funding for zero-emission vehicles. To provide continuous access to small size fleet voucher amounts, standard HVIP purchases began to be processed through HVIP instead of ISEF. In 2023, ISEF funding was requested within the first day of ISEF opening with the majority going toward standard HVIP voucher requests verses short term leases, rentals or Trucks as a Service (TaaS) projects.

Resource: See last page, Clean Transportation Funding Plans 2021-2025 which cites the above information.

HVIP Vouchers thru 4-30-25:

- **FCEV + BEV Vouchers** = 9,812 vouchers
- **FCEV** = 913 vouchers
 - FCEV = 217 redeemed
 - 2 % FCEV redeemed out of 9,812
 - FCEV = 696 un-redeemed
 - 7 % FCEV un-redeemed out of 9,812
- **BEV** = 8,899 vouchers
 - BEV = 4,793 redeemed
 - 49 % BEV redeemed out of 9,812
 - BEV = 4,106 un-redeemed
 - 42 % BEV un-redeemed out of 9,812

HVIP OEMs

- **FCEV + BEV OEMs** = (45) OEM's in HVIP currently
- **BEV OEMs:** 15-YEARS OF BEV INVENTORY AVAILABLE IN HVIP
 - 2011-2025 (56) OEMs in HVIP history = 4,793 vouchers redeemed to date
 - 2011-Current (44) OEMs in HVIP currently = (12) OEM's Extinct
 - 98% BEV OEMs
 - New Flyer supplies BEV & FCEV
- **FCEV OEMs:** 6-YEARS OF FCEV INVENTORY AVAILABLE IN HVIP
 - 2018-2025 (5) OEMs in HVIP history = 217 vouchers redeemed to date
 - 2025-Current (2) OEMs in HVIP currently = New Flyer & Hyundai
 - 4% FCEV OEMs
 - Average years FCEV OEMs in HVIP = 2.5 yrs
 - Hyundai is the only dedicated FCEV OEM in HVIP; but has submitted (0) vouchers
 - New Flyer supplies FCEV & BEV

YRS FCEV OEM in HVIP**FCEV OEM****FCEV VOUCHERS REDEEMED**

- 2018 (1)Yr ElDorado = (5) redeemed
- 2021-2025 (5)Yrs New Flyer = (95) redeemed
- 2022-2023 (2)Yrs Hyzon Motors = (7) redeemed
- 2023-2025 (3)Yrs Nikola = (110) redeemed
- 2024-2025 (2)Yrs Hyundai = (0) vouchers

HVIP REBATE PROPOSAL TABLE 5-30-25, PENDING APPROVAL

- All Plus-Up modifiers are eliminated
- Large size private fleets are allowed to participate in HVIP funding

New Voucher Amount Tables

Truck/Bus Class	Gross Vehicle Weight Rating	New Proposed Base Voucher	New Proposed Small Business Voucher
Class 2b	8,501-10,000	\$7,500	\$9,000
Class 3	10,001-14,000	\$15,000	\$40,000
Class 4	14001-16,000	\$25,000	\$50,000
Class 5	16,001-19,500	\$30,000	\$90,000
Class 6	19,501-26,000	\$30,000	\$90,000
Class 7	26,001-33,000	\$70,000	\$238,000
Class 8	33,001+	\$80,000	\$336,000
Class 8 Fuel Cell	33,001+	\$160,000	\$420,000

Resource: May 30th CARB presentation

https://ww2.arb.ca.gov/sites/default/files/2025-05/HVIP_COREWorkgroupSlides%20-%20May%202025.pdf

Resource: May 30th CARB event link, still no recording or list of attendees available as of 6-25-25

<https://ww2.arb.ca.gov/events/implementation-workgroup-meeting-fiscal-year-2024-25-clean-truck-and-bus-voucher-incentive>

HVIP REBATE TABLE, CURRENT & EFFECTIVE 10-31-25

- Large size Private Fleets are not allowed to participate effective 1-1-2025
- However, Fuel Cell technology is exempt from any fleet size requirements
- Tom's Truck Center modified existing table to reflect Max Rebate with modifiers



Zero-Emission Funding Table

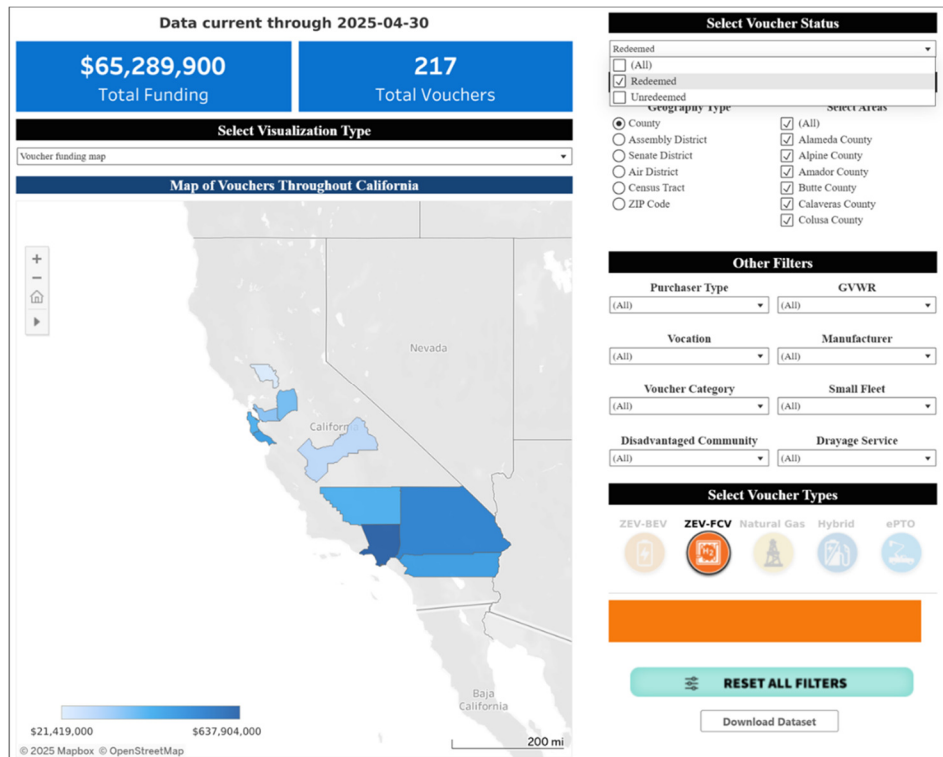
Vehicle Weight Class	Base*	Max Rebate with Modifiers
Class 2B	\$7,500	\$17,250
Class 3	\$45,000	\$103,500
Class 4-5	\$60,000	\$138,000
Class 6-7	\$85,000	\$195,500
Class 8	\$120,000	\$436,000
Class 8 (Fuel Cell)	\$120,000	\$676,000

Modifier Type	Modifier Amount
Class 8 Drayage Truck Early Adopter*	+25%
Refuse*	+25%
Disadvantaged Community**	+15%
Class 8 Fuel Cell	+100%
Public Transit Agencies***	+15%
School Buses for Public School Districts (not including Set-Aside funds)	+65%
Small Size Fleet	100%
POLA (Drayage)	\$75,000 \$100,000 (small fleet)

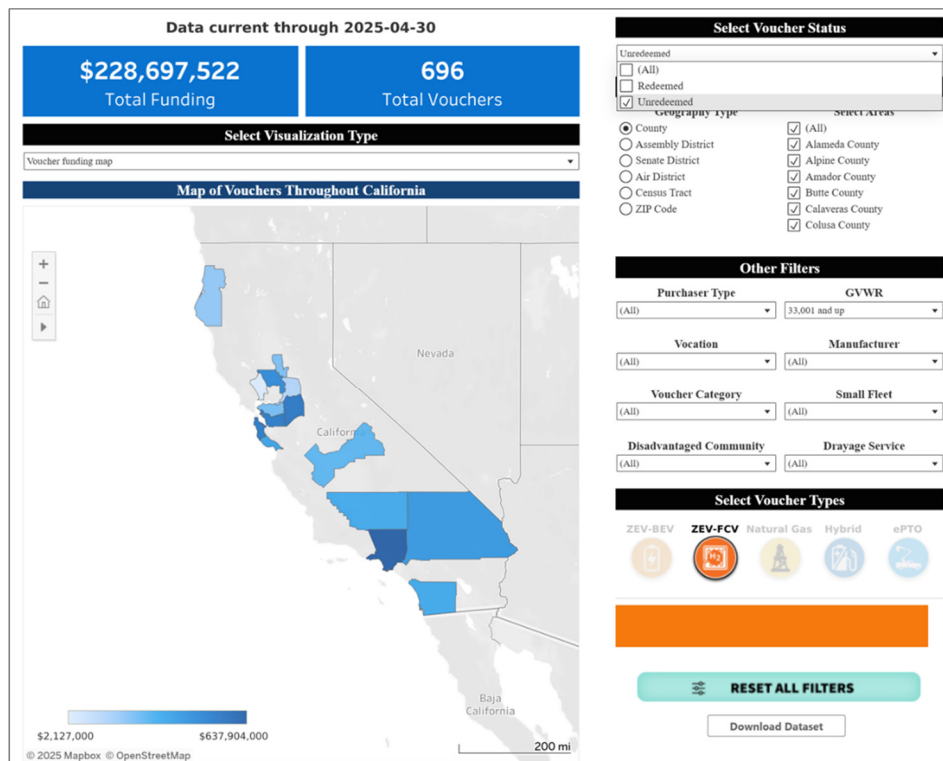
Resource on HVIP voucher funding tables and modifiers: scroll down the page.

<https://californiahvip.org/funding/>

HVIP IMPACT DATA - FCEV REDEMPTION DATA = 217 (ALL HISTORY of data thru 4-30-25)



HVIP IMPACT DATA - FCEV UNREEMED DATA = 696 (ALL HISTORY of data thru 4-30-25)

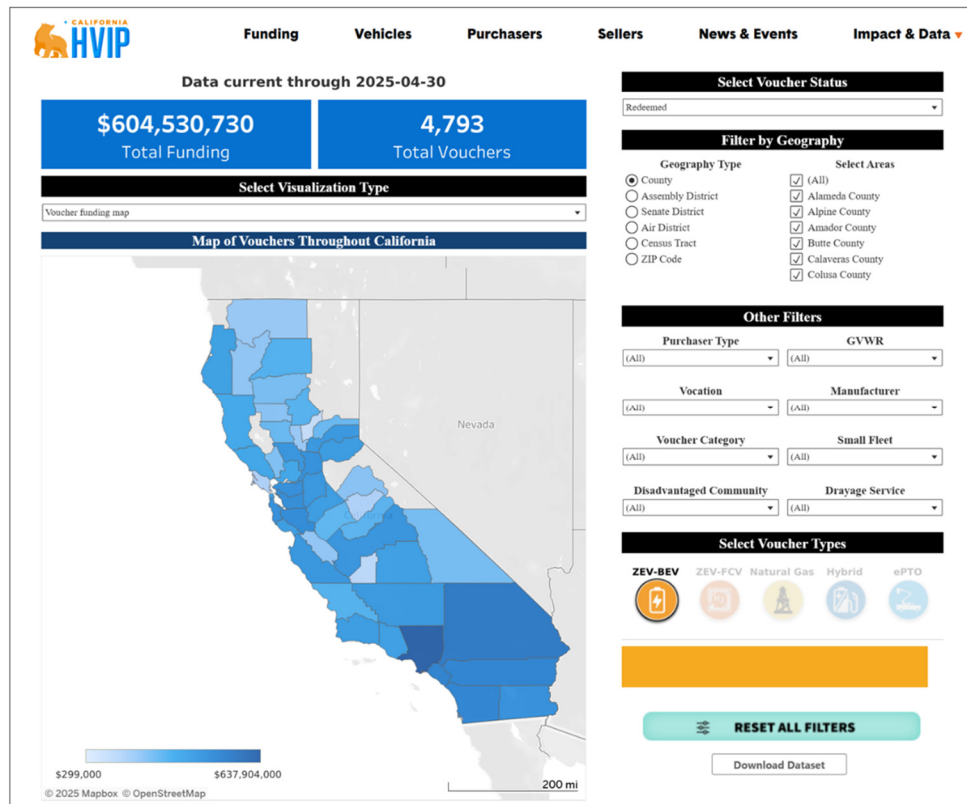


Resource on HVIP voucher data: FCEV voucher data thru 4-30-25 <https://californiahvip.org/impact/>

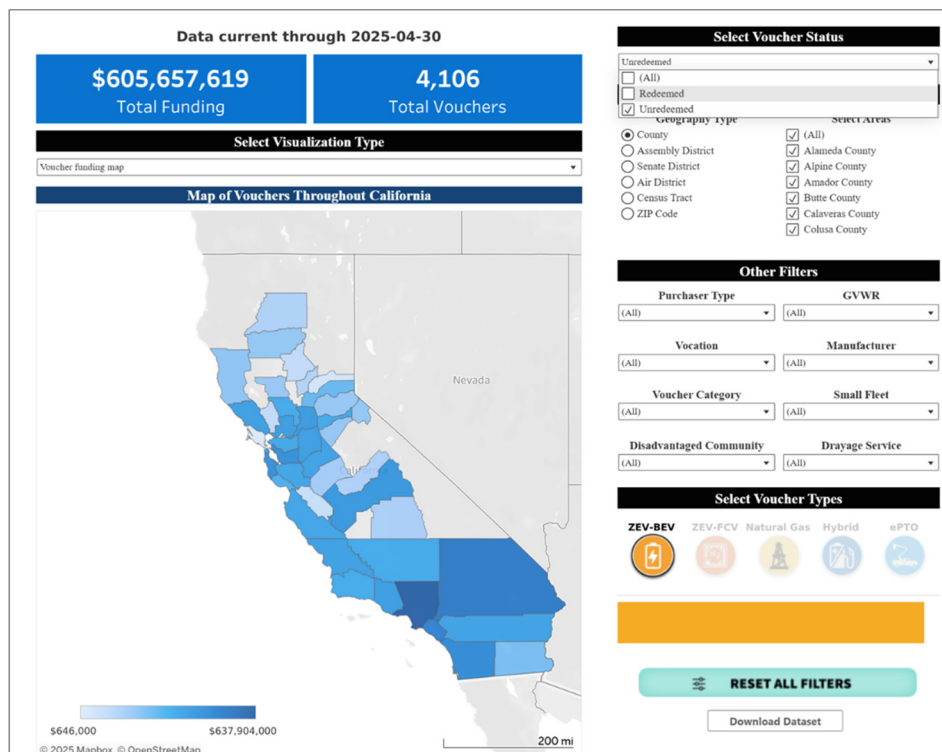
. Filter HVIP IMPACT data report by:

- Redeemed or Un-Redeemed
- FCEV Technology

HVIP IMPACT DATA - BEV REDEMPTION DATA = 4,793 (ALL HISTORY of data thru 4-30-25)



HVIP IMPACT DATA - BEV UNREEMED DATA = 4,106 (ALL HISTORY of data thru 4-30-25)



Resource on HVIP voucher data: BEV voucher data thru 4-30-25 <https://californiahvip.org/impact/>

Filter HVIP IMPACT data report by:

- Redeemed or Un-Redeemed
- BEV Technology

Resources, Clean Transportation Funding Plans 2021-2025:

- **2021-2022 Funding Plan, CARB Board approved 11-19-21**

<https://ww2.arb.ca.gov/resources/documents/low-carbon-transportation-investments-and-aqip-funding-plan-archive>

- Page 111: Zero-emission fuel cell trucks and buses would not be subject to fleet size limits until they achieve greater market penetration.

- **2022-2023 Funding Plan, CARB Board approved 11-17-22**

https://ww2.arb.ca.gov/sites/default/files/2022-10/proposed_fy2022_23_funding_plan_final.pdf

- Page 138: As approved in the FY 2021-22 Funding Plan, public entities and California Native American tribal governments will not be subject to the fleet size limit. New-to-market technologies such as FCEVs will not be subject to the fleet size limits until they receive a higher degree of market penetration, meaning fleets of any size can purchase fuel cell vehicles.
- Page 139: Public fleets and California Native American tribal government fleets with more than 10 medium- and heavy-duty vehicles and private fleets with between 11 and 100 medium- and heavy-duty vehicles will not be subject to the voucher amount reductions in the table above. Additionally, purchases of zero-emission FCEVs by private fleets with more than 10 medium- and heavy-duty vehicles would not be subject to the voucher amount reductions in the table above until fuel cell technologies achieve greater market penetration.
- Page 139: Small Size fleet and owner operators require incentives to be high enough to purchase zero emission

- **2023-2024 Funding Plan, CARB Board approved 11-16-23**

<https://ww2.arb.ca.gov/sites/default/files/2023-10/Proposed%20Funding%20Plan%20Fiscal%20Year%202023-24.pdf>

- Page 76: Small Size Fleet funding access

- **2024-2025 Funding Plan, CARB Board approved 11-21-24**

<https://ww2.arb.ca.gov/sites/default/files/2024-10/Proposed%20Funding%20Plan%20Fiscal%20Year%202024-25.pdf>

- Page 4-14 or 95: Public entities, California Native American Tribal governments, and non-profit organizations with 501(c)(3) status will not be subject to the fleet size limit. Additionally, entities purchasing new-to-market technologies, such as fuel cell vehicles, will not be subject to the fleet size limits until the technology has achieved a higher degree of market penetration, meaning fleets of any size can continue to purchase fuel cell vehicles through HVIP. There is no proposal to amend the effective date of January 1, 2025, for fleet size eligibility.

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