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From: Margaret Boelter <mboelter@zeemsolutions.com>
Sent: Monday, October 14, 2024 8:02 PM
To: ARB Clerk of the Board
Subject: Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines
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Zeem Solutions' comments are attached re: Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines.

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October 14, 2024
California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines

Dear California Air Resources Board Members and Staff,

Thank you for the opportunity to provide our comments and recommendations on the proposed revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program guidelines. We greatly appreciate the California Air Resources Board's (CARB) leadership in supporting and accelerating the transition to zero emission transportation.

Company Overview

Zeem Solutions offers charging, fleet management services, and electric vehicle leases that enable commercial fleets to transition to the zero-emission future easily and affordably. Zeem designs, builds, and operates multi-fleet shared charging depots for commercial fleets throughout the country near ports, airports, and warehousing & distribution centers. With Zeem, fleets of all sizes can choose the exact class and configuration of vehicle they need and drive it under an all-in lease that includes supervised charging, regular maintenance and cleaning, secure parking, and 24/7/365 operations at conveniently located hubs.

Our Inglewood, CA depot launched Phase I operations in December 2021 and finished full commissioning in December 2023. We have been serving customers with box trucks, cargo vans, passenger shuttles, step through vans, and tractors as well as light-duty commercial EVs for rental and rideshare companies. Located at 626 Isis Ave. and 8831 Aviation Blvd. in Inglewood, the two sites comprise a total of 3.1 acres, 78 fast charging ports, and 53 Level 2 chargers for a total of 7.5MW of charging power. At our Inglewood depot, we perform 800-900 charging sessions per day and dispense 700,000-800,000 kWh of energy per month.

Zeem is rapidly expanding our network of e-mobility hubs near transportation centers and cargo gateways across the United States to enable fleet operators to electrify. We broke ground on a site in September 2024 in Long Beach, CA and in the long-term plan to deploy sites throughout California. Under a standard build model, each site will be approximately 3-4 acres, install and operate 40 dual port and high-powered direct current fast chargers (DCFC), accommodate up to 300 vehicles for overnight charging and parking, and charge hundreds more throughout the day with contract/opportunity charging.

Comments

Chapter 4: On-Road Heavy-Duty Vehicles

Zeem supports changes to this chapter that support small fleets because small fleets are the most cost sensitive and have the largest barriers to electrifying their fleets. The alignment of small fleet definitions across HVIP and CMYR reduces complexity and the expansion of eligible costs improves access to ZEVs for these small operators.

Zeem also supports Carl Moyer's inclusion of fleets of greater than 20 vehicles in the program especially as the incremental cost between ZE and ICE vehicles remain high and as a large portion of fleets will be excluded from the HVIP program.

Chapter 10: Infrastructure

Zeem appreciates the increased funding opportunities, increased flexibility, and expansion of eligible project types.

The unique needs of MHD commercial fleets should be considered when prescribing public accessibility requirements. Zeem operates shared charging sites which can be defined as a site that is open to more than one fleet. These sites serve a public benefit by driving air quality improvements through increased deployments of ZE trucks. Charging for MHD vehicles is often secured behind a fence with controlled access to prevent vandalism and theft. Additionally, commercial vehicle operators are more likely to plan their charging in advance which minimizes the need for 24 hours per day, year-round access compared to passenger vehicles. Consequently, charging providers can plan charging sessions in advance, maximize charger utilization and efficiency, and prevent operational inefficiencies caused by unexpected visits.

Finally, staff should consider lowering requirements related to the 10% additional incentive for on-site solar/wind generation which requires at least 50% of the total annual energy provided to covered sources by the project must be generated from solar/wind. MHD charging sites are high powered and located in space-constrained locations (such as urban areas where the fleets with duty cycles suitable for electrification typically cluster). These two factors restrict the ability of on-site generation to supply 50% of energy needs.

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