

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street Sacramento, CA 95814
RE: Advanced Clean Fleet Rule

October 12, 2022

Dear Chair Randolph,

Hyliion wants to again thank the California Air Resource Board for their continued work to better improve air quality and climate protection in California. Through the Advanced Clean Fleet Rule, the Air Resource Board takes another step towards their ambitious goals. Hyliion produces electrified powertrain systems that can augment or fully replace traditional diesel- or natural gas-fueled powertrains, and are designed to become fully zero emission when infrastructure is widely available. Its systems are designed to improve performance and lower total cost of ownership while leveraging the existing alternative fuel infrastructure. Our vision for a global net-carbon-negative commercial transportation industry is ambitious, real and achievable through our technology.

As we stated in our previously submitted comments, Hyliion's zero-emission platform, the Hypertruck ERX™, uses an onboard generator to continually recharge the battery pack while under power, eliminating the significant range and infrastructure challenges other electric trucks now face. Fleets will be able to maximize uptime and see virtually no impact on payload capacity, which will enable all-electric, zero-emission operation in the neighborhoods and cities where improved air quality is most important. With a range of 1000 miles at launch, the ERX fills a vital need today where BEVs cannot. Most importantly, through the integration of plug-in charging capability and optimizing all-electric range (AER), the ERX complies with both the Advanced Clean Truck and the proposed Advanced Clean Fleet regulations.

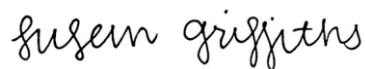
Vehicles, such as the ERX, that run on renewable natural gas remove more harmful carbon dioxide from the air than their output. This is perfectly inline with CARB's measures to decrease carbon intensity in the state of California, as nearly 100% of the natural gas used for transportation fuel in the Golden State is renewable, and has an average CARB-certified carbon intensity value of below zero. Further, technologies like the ERX not only provide an important tool to enhance climate protection, but make a lasting impact on air quality as well, as the platform utilizes generators certified to the Optional Low NOx emission standard.

In our previously submitted comments, we applauded the general outcomes and underlying efforts of the rule. However, we wish to encourage CARB to carefully consider the requirement of drayage vehicles to be only zero emission by 2035. Allowing near zero emissions standards for drayage trucks will provide a larger pool of purchase options that could not only save cost but also provide a greater impact on near term and total emissions reductions. Ports and railyards historically have some of the worst air quality in California. Allowing access to lower cost options that can deliver the performance that drayage fleets need today can have an incredible aggregate affect. We at Hyliion believe that bridge technologies and near zero emissions solutions can provide immediate and substantial progress on emissions reductions, particularly in the areas that need it the most. As CARB has allowed in the priority fleet version of the rule, we urge the Board to also allow Near Zero Emissions Vehicles (NZEVs) to generate ZEV credits in the drayage section of the rule.

Additionally, we again wish to extend our support of the full credit for NZEVs, assuming the definition of NZEVs is equivalent to the definition provided in the Advanced Clean Truck Regulation. By allowing NZEVs to receive a full ZEV credit, fleets can purchase a lower cost and more functional vehicle while still making a lasting impact on air quality and climate protection. Creating incentives like this allows for a cleaner future at a fraction of the cost, without impacting performance or payload.

Hyliion appreciates CARB's efforts and asks the Board to consider these comments on drayage standards and NZEV credits. We believe that Hyliion's ERX electric powertrain platform can deliver real and meaningful benefits to California in the near term and facilitate the adjustment of the state's commercial fleet operators to a zero-emission future. Thank you for your attention to this matter, and we look forward to working with you.

Respectfully,

A handwritten signature in black ink that reads "Susan Griffiths". The script is cursive and fluid, with the first name "Susan" and last name "Griffiths" clearly legible.

Susan Griffiths
Hyliion, Inc.
Director of Regulatory Affairs and Product Compliance