

November 8, 2022
California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: 2022-23 Funding Plan for Clean Transportation Incentives

Dear California Air Resources Board Staff,

Zeem Solutions (Zeem) appreciates the opportunity to provide comments on the 2022-23 Funding Plan for Clean Transportation Incentives in support of medium- and heavy-duty zero emission vehicle investments, particularly the \$265 million investment in the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) and \$35 million investment in the Innovative Small e-Fleets (ISEF) program.

Zeem Solution's mission is to transform the way fleets operate by providing affordable solutions for zero emission transportation that improves air quality within our communities. We build and operate zero emission vehicle (ZEV) depots for medium- and heavy-duty fleets throughout the country. Our basic depot services include vehicle leasing, vehicle charging, secured parking, vehicle maintenance, lounge space for drivers, and opportunity charging.

CARB's HVIP and ISEF voucher programs are critical to ensure the transition to ZEV in the medium- and heavy-duty space. Zeem compiles incentives and leverages economies of scale to bring ZEVs to cost parity or below internal combustion engine vehicles (ICEV). Zeem simplifies the process for fleets by navigating all relevant programs including point-of-sale vehicle vouchers, make-ready infrastructure incentives, and the Low Carbon Fuel Standard (LCFS) on customers' behalf to directly lower their costs.

As a leader in advancing ZEV adoption for small fleets, Zeem has a unique understanding of the challenges for small fleets. Over the past few years, Zeem has had detailed discussions with over 5,000 fleets across California – 94% of which have 100 or fewer vehicles and 60% of which have explicitly expressed interest in transitioning their fleets to commercial ZEVs. Zeem has seen firsthand how cost-sensitive small fleet customers are now able to transition to ZEVs because of the ISEF program which lowers cost, vehicle, and infrastructure procurement barriers.

We urge staff to adopt the proposed budget to support fleets and companies who serve fleets. We look forward to working with staff and stakeholders to advance our common objective of decarbonizing transportation and enabling access to zero emission transportation for fleets.

Sincerely,



Paul Gioupis
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