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September 1, 2021

California Air Resources Board
1101 I Street
Sacramento, CA 95814

Submitted Electronically

SUBJECT: ADVANCED CLEAN CARS II WORKSHOP COMMENTS

The California Chamber of Commerce and TechNet are pleased to submit these informal comments to the discussion of proposed credits presented at the California Air Resources Board (CARB) proposed Advanced Clean Cars II workshop on August 11, 2021.

As it develops regulations regarding zero emission vehicles, CARB should be careful to consider the economic impacts to consumers and businesses that adopt ZEVs, including issues surrounding sufficient infrastructure and incentives to make ZEVs cost-effective for all Californians. ARB should also strongly consider the inclusion of partial ZEVs/hybrid vehicles, which have been wildly popular and help bridge the gap where infrastructure is not available. In that regard, CARB should incentivize all available low carbon transportation technologies including low carbon liquid fuels. California consumers and businesses have varied mobility needs and a variety of low and zero carbon solutions should be encouraged to ensure a reliable and cost-effective transportation system to meet the State's climate goals.

To the extent California addresses these issues and moves forward with more stringent ACC rules, we support CARB's expansion of credits and multipliers that encourage deployment of zero emission vehicles (ZEVs) and partial ZEVs in disadvantaged communities through incentives. In addition, CARB should consider programs that credit drivers and/or companies that deploy ZEVs and partial ZEVs for high mileage use. In addition to a high mileage multiplier for individuals that must commute long distances, CARB should consider credits and multipliers for vehicles used primarily or secondarily in commercial applications and shared mobility such as ride sharing and autonomous vehicle platforms, where mileage is likely to be higher than the average driver.

When deployed for shared mobility, whether by a commercial enterprise or by individuals driving on a shared mobility platform, ZEVs provide even more environmental benefit than simple sales to private customers with average driving patterns. CARB should consider additional credits based on mileage or usage, as these vehicles will be driven more than typical vehicles. This usage can also help to drive down the cost of ZEVs for all consumers, better acquaint drivers with ZEV technology, helping to educate consumers on the benefits of driving a ZEV.

As CARB continues to develop its ACC II regulation, we encourage the staff to consider and develop incentives, including credits or multipliers for vehicles deployed on shared mobility and autonomous vehicle platforms that will drive down the cost and otherwise encourage the adoption of ZEVs through incentives rather than mandates. We look forward to future workshops with additional details on CARB's proposal.

Finally, as with all regulations, CARB should continue to evaluate alternatives and ensure the most cost-effective pathway to meet our climate goals.

Sincerely,



Leah Silverthorn, Senior Policy Advocate
California Chamber of Commerce



Cameron Demetre, Deputy Executive Director
TechNet

cc: Alice Reynolds, Office of the Governor