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November 8, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: FY 21-22 Low Carbon Transportation Funding Plan

Dear California Air Resources Board Staff,

Clean Cold Power (CCP) appreciates the opportunity to comment on the FY 21-22 Low Carbon Transportation Funding Plan. CCP is thankful for the significant proposed investment for the advancement of clean transportation and prioritization of zero-emission vehicle (ZEV) and ZEV infrastructure incentives.

CCP is deploying cost-effective, safe, and easy to install zero-emission transportation refrigeration units (TRUs). Our nitrogen-based cooling system provides efficient cooling in the transport of food, medicine, and other goods, which provides a cleaner and more sustainable alternative to conventional diesel refrigeration units. Our TRUs are powered by sustainable nitrogen, from air – without combustion, fuel or the extraordinary pollution generated by conventional diesel-powered refrigeration. Every CCP TRU that replaces a diesel one has the same benefit to clean air as taking 80 cars off the road. In addition, CCP's TRUs are much quieter, reach cold temperatures much faster, and have more precise cooling control than conventional systems.

CCP strongly supports the proposed \$195 million allocation to the CORE program, which will help accelerate deployment and commercialization of advanced technology in the off-road sector by providing streamlined funding for fleets to offset the incremental cost of cleaner technologies. The proposed investment will provide much needed funding to support the deployment of zero-emission TRUs throughout the state, which will significantly reduce greenhouse gas and eliminate criteria pollutant emissions. There has been significant interest and demand for CORE funding to date, and with the program currently being oversubscribed, there is a need for additional funding at the proposed level.

CCP appreciates the opportunity to provide input and support for ARB's FY 21-22 Low Carbon Transportation Funding Plan. We look forward to continuing to work with ARB and other stakeholders to accelerate the deployment and commercialization zero-emission off-road equipment, including zero-emission TRUs.

Sincerely,

Tom Keller

Tom Keller
CEO
Clean Cold Power