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June 24, 2021

Mr. Mark Williams, Mailstop 3E
California Air Resources Board
Post Office Box 2815
Sacramento, CA 95812

Re: Comments on Electrify America’s California ZEV Investment Plan: Cycle 3

I. Introduction

AMPLY Power appreciates the opportunity to provide comment on Electrify America’s “California ZEV Investment Plan: Cycle 3” (Investment Plan) submitted to the California Air Resources Board (“CARB”) on May 28, 2021. AMPLY Power provides Charging-as-a-Service to de-risk and accelerate the adoption of electric buses, trucks and passenger vehicles by public and private fleets through its simple price-per-mile driven model. AMPLY provides a fully managed charging solution that enables municipal and commercial fleets to deploy electric vehicles confidently and without hassles. AMPLY handles all aspects of charging operations on behalf of fleet owners, and AMPLY’s charging systems are optimized for the lowest electricity costs.

Electrifying high-mileage fleets is a high-impact strategy for reducing emissions — they drive more than three times the average distance of non-commercial vehicles and have the potential to reduce GHG emissions per passenger by up to fifty percent per mile. Yet, fleet operators, including local school districts, transit agencies, municipal governments and other entities face multiple barriers to adopting electric vehicles due to limited resources and bandwidth. To that end, AMPLY Power appreciates the Investment Plan’s goal of working “closely with fleet owners to ensure the equipment deployed is optimized for their needs.”¹ We believe that the Investment Plan can be further refined to help ensure that proposed investments accelerate the deployment of infrastructure for fleet applications that have the greatest impact on reducing GHG emissions.

II. Be Inclusive and Agnostic to Diverse Vehicle and Charging Use

We commend Electrify America and the California Air Resources Board (CARB) for recognizing that the electrification of critical fleets will “require deployment of targeted, and in some cases dedicated, DCFC stations for MHD fleets,” and the need to “to collaborate [with other California agencies] to maximize overall investment impact.”² When evaluating its infrastructure investments, we respectfully encourage CARB and Electrify America to consider the following design principles:

- Increase infrastructure investments designed specifically for fleets.
- Be inclusive and agnostic to fleet managers’ business models.
- Be inclusive and agnostic to diverse vehicle and charging use cases (e.g. transit fleets, drayage truck fleets, shared electric autonomous vehicle fleets and transportation network companies) for funding and collaboration with utilities’ make-ready programs to encourage shovel-ready projects.

¹ California ZEV Investment Plan: Cycle 3, page 43.

² California ZEV Investment Plan: Cycle 3, pages 43-44.



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- Be inclusive and agnostic to technology – both networked Level 2 and DC fast charging will be critical for fleets.
- Privately-owned DCFCs that serve a public benefit, such as through electrifying delivery fleets, should be eligible for Investment Plan funding. This is a business model that is an important solution that can further the state’s goals of electrification and fleet deployment. Promoting new innovative business models will help further grow the market and increase private investment in this sector.

III. Streamlining Permitting, Interconnections and Service Upgrade Request Process

Separate from incentives, some cities and utilities need additional tools to expedite and streamline permitting and interconnection timelines, and to standardize the service upgrade request process for charging stations. When evaluating its infrastructure investments, we respectfully encourage CARB and Electrify America to incentivize projects that provide an online portal or clearinghouse that offers standardized forms and tools to simplify these processes. This is an especially acute issue for smaller and rural cities and utilities, encompassing many low-income and disadvantaged communities, that lack staffing and technical capacity. An online portal that supports cities’ processes to streamline permitting for charging stations, and standardize the service upgrade request process would further the goals and requirements of AB 1236 (Chiu, 2015), similar to the portal that many cities have created for solar installation permitting.

AMPLY Power thanks CARB and Electrify America for the opportunity to provide comments. We look forward to continuing to collaborate with CARB and Electrify America to ensure ZEV Investment Plans advance California’s climate, equity and economic goals.

Sincerely,

/s/Heidi Sickler

Heidi Sickler
Director of Policy
AMPLY Power