



AMPLY Power, Inc.      [www.amplypower.com](http://www.amplypower.com)  
335 E. Middlefield Rd, Mountain View, CA 94043

January 6, 2022

Rajindar Sahora  
Deputy Executive Officer  
California Air Resources Board  
Low Carbon Fuel Standard Program  
1001 I Street  
Sacramento, California 95814

**Re: AMPLY Power Comments on the December 7, 2021, Low Carbon Fuel Standard (LCFS) Workshop – Potential Future Changes to the LCFS Program.**

Dear Mr. Sahora,

AMPLY Power (“AMPLY”) appreciates the opportunity to submit comments on the potential future changes to the Low Carbon Future Standard (“LCFS”) program. AMPLY Power provides Charging-as-a-Service to de-risk and accelerate the adoption of electric vehicles by public and private fleet operators through its simple price-per-mile driven model. AMPLY provides fully managed charging and software solutions that enable municipal and commercial fleets to deploy electric vehicle fleets 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. AMPLY is now delivering 100 percent clean energy to its electric fleet customers. We now ensure only California-sourced renewable power from wind and solar sources is used by our California fleet customers in order to reduce the effects of climate change through the adoption of clean energy.

High mileage fleets are playing an increasing role in California’s transportation system, including transit fleets, drayage truck fleets, shared electric autonomous vehicle fleets, and transportation network companies, to name a few. 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 Greenhouse Gas emissions per passenger by up to fifty percent per mile. Careful rate design, incentives, or other mechanisms can be utilized to accelerate a shift to electric fleets. Clean fuel programs, such as California’s LCFS and Oregon’s Clean Fuels Program, encourage targeted economic development carbon credits, and can be leveraged to increase revenue.

Concurring with TeraWatt and other stakeholder comments, AMPLY could be supportive of Staff’s proposal to extend the Hydrogen Refueling Infrastructure (“HRI”) pathway to support medium- and heavy-duty refueling applications if the Fast Charging Infrastructure (“FCI”) pathway to support battery electric trucks is also extended. LCFS credits earned over the lifetime of electric vehicles help accelerate deployment of electric vehicle charging infrastructure. This financing mechanism is particularly important for fleet customers who may need secure, multi-year financing to support long-term infrastructure projects. Multi-year decisions allow for



AMPLY Power, Inc.      [www.amplypower.com](http://www.amplypower.com)  
335 E. Middlefield Rd, Mountain View, CA 94043

forward-pricing of infrastructure (which should decline in cost as volumes increase) and allow for deployment of infrastructure ahead of volume of vehicles

AMPLY commends Staff and the Board for their leadership in implementing an effective LCFS Program and looks forward to the amendment process to further refine the proposed LCFS Regulation to meet the Program's 2030 compliance targets.

Sincerely,

*/s/Heidi Sickler*

Heidi Sickler  
Director of Policy  
AMPLY Power