



Wednesday, May 27, 2020

The Lion Electric Co.  
4522 Parker Avenue, Suite 350  
McClellan Park, CA, 95652

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**RE: The Lion Electric Co. Comments on Proposed Amendments to the Proposed Advanced Clean Trucks Regulation**

Dear Mr. Corey,

The Lion Electric Co. hopes you and your loved ones are safe and healthy during these difficult weeks. We wish you the best as we all work together to get through these unprecedented times.

Lion would like to thank you and the California Air Resources Board (CARB) for reducing emissions in California through the deployment of clean transportation technology. Lion fully supports CARB in its proposal of this regulation. The spirit and purpose of this regulation aligns strongly with both Lion's mission as a company solely devoted to zero-emission heavy-duty vehicle deployment and with California's goal to reduce greenhouse gas and criteria pollutant emissions. Not only will this regulation accelerate the deployment of zero-emission trucks, it will also serve as a model for future regulations designed to do the same for other zero-emission vehicle types. Most importantly, this regulation will reduce pollutants and emissions throughout California and will clean our air.

As you may know, Lion is a leading Original Equipment Manufacturer of all-electric vehicles, including zero-emission Type A, C and D school buses and zero-emission trucks and shuttle buses, with its biggest deployments in California. Today, there are currently over 300 Lion electric vehicles in operation in North America that have been operating every day safely for the last three years, with over six million miles of service provided. We are deeply invested in the State of California with Experience Centers in Sacramento and Los Angeles and over twenty-five full-time employees in the State.

Please see below for our comments on the proposed amendments to the Advanced Clean Trucks Regulation:

- We strongly support CARB's decision to increase the ZEV sales percentage requirement for Class 4-8 trucks and Class 7-8 Tractors. This will strengthen the reach and impact of this Regulation and will help California achieve its air quality goals in more effectively. It will also realize cleaner air for more of our





communities and help reduce the amount of negative health impacts resulting from polluted air. During these difficult times when the health of Californians is threatened by the COVID-19 pandemic, it is important to focus on bringing clean air and health-related resiliency to our residents.

- We strongly support CARB's decision to extend the sales requirement past 2030 to include 2035 and beyond. This will ensure that progress continues to be made towards a ZEV future and help the state more swiftly realize its air quality goals. It will also help guard against any backsliding that may occur if manufacturers are not continually held to a regulatory standard.
- We respectfully request that CARB add Lion vehicles to its list of eligible zero-emission Class 4-8 trucks and Class 7-8 tractors. Not only are our electric Class 6 and 8 trucks available this year (the Lion6 and Lion8, respectively), we will also have our electric Class 5 and 7 trucks available next year, in addition to our electric Class 8 Tractor. We are proud to be able to say that we can deliver our Lion6 and Lion8 this year, and we would appreciate the opportunity to be included in CARB's analysis document in Attachment B.
- We suggest not extending the near-zero emission vehicle (NZEV) credit beyond 2030 because ZEVs themselves will be fully accessible and commercialized by 2030, so no credit extension for NZEV would be necessary. This would continue to support NZEV sales at a time when ZEVs are commercialized and should be prioritized so that our progress towards achieving the state's air quality goals is not compromised.
- We caution against using the all-electric range of an NZE vehicle as a metric of its actual clean air value. We suggest that CARB instead measure the battery capacity of such vehicles (in kWh) as opposed to its claimed all-electric mile range, as electric range can be hard to calculate given the number of factors that affect range.
- We suggest CARB remain open to reevaluating the Advanced Clean Trucks Regulation as we start to approach the 2035 year mark, in order to ensure that progress towards a zero-emission future does not stagnate at the required percentages set for 2035 and beyond (for all truck classes). This would serve to further help the state reach its carbon neutrality goals by 2045. If California were to achieve its goals early or in excess of its original benchmarks, it would present a valuable case study to other states in the nation and be an example of how strong regulations and incentives can lead to successful results.
- We strongly support CARB's decision to expand the definition of "large entity" to include fleets that have 50 or more vehicles. This will ensure that the effects and benefits of the Regulation are more widely felt and thus make a larger impact on ZEV sales and our state's long-term air quality goals.





Overall, we strongly support CARB's decision to strengthen the proposed Advanced Clean Trucks Regulation and are ready to publicly support CARB when the Regulation goes to the Board again later this year. If CARB were to consider further strengthening the Regulation, we would be proud to support that decision as well.

Lion would like to thank CARB again for its work to date on accelerating the deployment of zero-emission vehicles throughout the state to ensure that all community members have access to sustainable transportation and breathe clean air. As a manufacturer of all-electric zero-emission heavy-duty vehicles, we are proud to support CARB as it facilitates the transition to a cleaner, healthier California for all.

We remain available for a digital meeting or phone call to answer any questions. The Lion team looks forward to continuing to work with CARB into the foreseeable future.

Sincerely,

Nate Baguio  
Vice President of Sales  
[Nate.baguio@thelionelectric.com](mailto:Nate.baguio@thelionelectric.com)

