



May 27th, 2020

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Advanced Clean Truck Regulation 15-Day Changes

Dear Board Members and Staff,

Thank you for the opportunity to provide comments on the proposed 15-day changes to the Advanced Clean Truck Regulation (ACT).

HummingbirdEV, headquartered in Livermore, California, is an experienced engineering and manufacturing electric vehicle powertrain provider. We specialize in medium- and heavy-duty electric powertrains and provide innovative well-to-wheel solutions, with a unique onboard fast-charging EVSE, vehicle-to-vehicle (V2V) and vehicle-to-grid (V2G) technologies for on- and off-road zero-emission heavy-duty vehicles, and are focused on serving disadvantaged communities in the San Joaquin Valley. The HummingbirdEV team has a proven track record in the development and scaled deployment of battery-electric trucks and other zero-emission vehicles, which have collectively accumulated more than 8 million zero-emission miles throughout California and beyond.

HummingbirdEV appreciates the Air Resources Board's continued efforts to advance the commercialization and adoption of zero-emission technology. We support the ACT and the proposed 15-day changes to further support ZEV truck deployments, and urge approval the proposed regulation, which will further transform California's transportation system to zero emissions and help achieve the state's air pollution and climate goals. Within the proposed changes, HummingbirdEV specifically supports:

- Changes to increase the early requirements to implement the rule at high levels in MY 2024 and moving forward.
- Changes to increase requirements in later years and add continued ramping up of targets past 2030. This will help create a pathway to achieving the state's goals of a 15% ZE fleet by 2033 and carbon neutrality by 2045, as well as provide the needed market signals to help continue advance and commercialize zero-emission trucks and tractors.

The aggressive but achievable targets will be critical to improving air quality in some of the state's most adversely effected and disadvantaged communities, which often rely on trucking for agriculture and freight purposes. While this rule alone will not be sufficient to fully meet the goals set at regional or state levels, the ACT regulation is a critical step forward that will send clear market signals to further advance the development and scale of the zero emission truck market.

Thank you for the opportunity to provide comments on the proposed 15-day changes to the Advanced Clean Truck Regulation. HummingbirdEV looks forward to continuing to work with fleet and vehicle operators to help carry out the goals of this program and urges passage of the regulation.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Koneru", with a period at the end.

Rakesh Koneru
COO, HummingbirdEV