

Bechtold, Bradley@ARB

From: ARB Clerk of the Board
Sent: Thursday, June 25, 2020 9:55 AM
To: Bechtold, Bradley@ARB
Subject: FW: Odyne Systems, Difficulty submitting comments for ACT
Attachments: Odyne comments on ACT 6-25-2020 Final.pdf

From: Dalum, Joe <Joe.Dalum@odyne.com>
Sent: Thursday, June 25, 2020 9:54 AM
To: ARB Clerk of the Board <cotb@arb.ca.gov>
Subject: Odyne Systems, Difficulty submitting comments for ACT

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Dear Clerk of the Board,

I am unable to submit comments for the ACT regulation: the error code is shown below

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Your support ID is: 5679973826790028243

Can it be fixed?

Can you submit the comments below into the system?

Please see the comments below:

Comments of Joseph T. Dalum, President of Odyne Systems, LLC

June 25, 2020

NZEV Credit for Zero Emissions Worksite (ePTO)
Advanced Clean Trucks Regulation

AGENCY:

California Air Resources Board

To:
Mary Nichols, Chair
California Air Resources Board
1001 1 Street
Sacramento, CA 95814

From:

Joseph T. Dalum
President, Odyne Systems, LLC
W237 N2878 Woodgate Road, Suite 2
Pewaukee, WI 53072
Ph: (262) 544-8405
Email: joe.dalum@odyne.com

RE: Advanced Clean Trucks Regulations

Dear Chair Nichols and Board Members,

Odyne Systems, LLC (Odyne) appreciates the opportunity to provide comments on the proposed Advanced Clean Trucks Regulation.

Odyne develops and sells zero-emission solutions for trucks operating at worksites, also known as electric power take-off or ePTO systems.

Thousands of medium and heavy-duty trucks operating in California spend much of the day running engines to provide power for truck mounted equipment when stationary or use truck mounted generators to supply power for worksites. Examples include utility trucks that operate engines for many hours to power a bucket lift to repair power lines, trucks at construction sites operating cranes to load and unload material, trucks operated by municipalities to repair underground infrastructure using jack hammers powered by truck mounted compressors, and many, many other applications where truck engines are primarily used to power equipment.

Truck electrification systems are available and in use that eliminate the operation of truck engines at worksites for the entire day, resulting in zero emissions, fully electrified modes of operation. Third-party studies, paid for by the state of California, have shown that ePTO systems provide extraordinarily strong full-day NOx emission reductions of up to 96% and full-day fuel savings up to 65%.

Odyne respectfully recommends that the air resources board include vehicles with approved ePTO systems in its definition of Near-zero-emission vehicles in the proposed Advanced Clean Trucks Regulations.

CARB in consultation with the California Energy Commission, defined near zero-emission as vehicles that have a duty-cycle that includes zero-emission operation, including ePTOs, and provided incentive funding through HVIP to encourage the use of ePTO systems. CARB wrote that "These vehicles create a pathway to zero-emissions and help to ensure that funding supports early commercial deployment of zero- and near zero-emission heavy-duty truck technology per the requirements of SB 1204 and SB 1403."

Specifically, Odyne recommends changing the language of "NZEV" to include:

(C) An on-road plug-in vehicle with an electric power take-off (ePTO) that is capable of zero emissions operation of equipment and accessories, such as, for example, pumps, compressors, generators and TRUs, and that meets the requirements of section 5(a) through section 5(k) of the IMPLEMENTATION MANUAL FOR THE HYBRID AND ZERO-EMISSION TRUCK AND BUS VOUCHER INCENTIVE PROJECT (HVIP), dated June 4, 2020 as released by the California Air Resources Board.

The credits for near-zero-emission vehicles with ePTOs could accrue to the chassis OEM using a delegated assembly relationship as defined in "The Zero-Emission Powertrain Certification Amendments to California Greenhouse Gas Exhaust Emission Standards And Test Procedures For 2014 And Subsequent Model Heavy-Duty Vehicles."

Adding a regulatory incentive to accelerate the adoption of ePTO technology would result in more quickly reaching criteria and GHG emission reduction goals, while providing communities with other benefits such as reduced noise, due to the quiet stationary operation of work trucks without idling. Commercial operators would benefit from reduced fuel consumption, reduced engine maintenance and more flexible operating hours.

While Odyne supports a quick transition to full electric vehicle operation, many trucks, such as utility trucks and fire trucks need to operate after a natural disaster, such as an earthquake that could disrupt grid power. Fully electric trucks could pose limitations on disaster response during a large-scale grid outage or reduce the ability to perform storm damage assistance in locations without operating grids for recharging. Trucks with ePTO systems could save fuel and emissions during normal operation and still perform without requiring access to the grid during emergencies.

Although outside the scope of ACT, Odyne also recommends that the air resources board consider mandating the use of ePTO technology in certain zones with high NOx emissions. ePTO systems can be installed on existing trucks as a retrofit providing the ability to rapidly reduce emissions without waiting for new trucks with reduced emissions to be produced to replace existing trucks. Many larger medium and heavy-duty vehicle can remain in the field for over 20 years; relying only upon the turn-over of trucks before introducing improved emissions reduction technology will delay the attainment of overall emissions reduction goals.

In summary, Odyne supports the transition to electrified vehicle operation and believes the use of ePTO systems to provide zero emissions fully electric operation of trucks at worksites is an important step towards that goal. Odyne respectfully asks that ePTO systems be included in the definition of a Near Zero-Emissions Vehicle in the proposed Advanced Clean Truck Regulation.

Best regards,

Joseph T. Dalumt
President and CEO
Odyne System, LLC

Note: Please see the attached document for references

Sent from [Mail](#) for Windows 10