



Advanced Clean Fleets Regulation Workshop to Discuss Proposed Changes to Draft Regulation Language

Official Comments Submission

April 7, 2023

My name is Michelle Avary, I am Vice President of Government Affairs and Product Strategy for Einride, the largest EV freight operator in the US and the EU. Thank you for the opportunity to submit official comments and testify to the proposed California Advanced Clean Fleets Regulation (CA ACF).

Einride is a freight technology company that provides turn-key solutions technologies for shippers to transition their freight operations from diesel to electric trucks. Specifically, we procure and install charging hardware for electric trucks, as well as operating the largest EV truck fleet in the U.S. as a service for our shipping customers - in pursuit of our mission to decarbonize freight through intelligent movement. Additionally, Einride is building the largest heavy duty EV charging facility in the U.S. in California near the port of LA/Long Beach.

Einride is proud to endorse CARB's proposed rulemaking and the adoption of amendments that will accelerate the Advanced Clean Fleets requirements from 2040 to 2036. Advancing the adoption of heavy duty electric trucks is key to fighting climate change and achieving better environmental justice outcomes for both California and the country at large.

As a company whose mission is freight decarbonization, Einride is strongly supportive of CARB's objectives for transitioning Class 2b-8 vehicles to become zero emission. As an intelligent freight company offering ZE heavy duty trucks, Einride is deeply familiar with the immense environmental benefits created with each MHDZEV adoption and we walk the talk. Later this year, Einride will break ground on the single largest heavy duty EV charging station in the United States in Lynwood, California. From that site, Einride will operate an initial fleet of 60 battery-electric class 8 trucks to serve customers at the Ports of Los Angeles and Long Beach.

Our Einride station will utilize clean energy provided by Southern California Edison and serve routes operating between the ports and the San Bernardino Valley. Located in a disadvantaged, low-income community and within a half mile of three schools, Einride's station in Lynwood will bring cleaner air, reduce noise pollution, and help redress the environmental justice burdens carried by this community of the heavy trucking industry presence it hosts.

In addition to our planned deployment in Lynwood, Einride has trucks operating in three states and will go live in four more by the year's end. We are living proof that heavy duty electric freight is a viable and economic option for fleets today and we believe that full electrification is not only possible in the near future, but also necessary.

A recent study by the North American Council for Freight Efficiency found that nearly half of all freight moved by truck in the United States could be electrified immediately provided adequate vehicle supply. Strong regulatory action by CARB will send the market signals necessary to drive increased production of these vehicles and incentivize ongoing product development to expand the range and capacity of heavy duty electric freight vehicles.



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CARB's leadership on this front has an impact beyond California's borders as more and more states adopt the Advanced Clean Trucks rule and will look to follow California's lead on Advanced Clean Fleets. Seventeen states plus Canadian province Quebec have adopted some version of California's vehicle emissions standards and Einride is part of a national coalition working to increase that number. Your actions today will impact the long-term national trajectory of clean freight and we are grateful for your commitment.

Thank you for your responsiveness to comments from the public during your February hearing. We appreciate CARB's leadership on this matter. If Einride can be of any assistance, please do not hesitate to reach out.

Sincerely,

Michelle Avary
Vice President, Government Affairs and Product Strategy
Einride