



April 7, 2023

Range Energy, Inc.

1060 La Avenida St.
Mountain View, CA 94043

California Air Resources Board

1001 "I" Street
Sacramento, CA 95814

RE: Range Energy Comments on Proposed Advanced Clean Fleet Regulation Order

Dear California Air Resources Board Staff,

Thank you for the opportunity to provide comments and support for the proposed Advanced Clean Fleet Regulation Order. Range Energy appreciates the Air Resources Board's commitment to electrification and eliminating mobile emissions from medium- and heavy-duty trucks and stands ready to assist fleets in implementing the rule and maximizing zero-emission miles in California.

Range Energy (Range) is a California-based company on a mission to make towing cleaner, safer, and more convenient. It is doing so by delivering an all-electric propulsion assist system for heavy duty trailers. Range Energy trailers are fully compatible with all tow vehicles and all drivetrains (EV, H2, and diesel). Our battery is sized for the trailer and delivers more benefits with less weight and lower cost. For fleets deploying electric drive tractors, our solution can double EV range, expanding the use cases in which these zero-emission vehicles can be used. For fleets using IC tractors, our solution instantly creates an entire fleet of plug-in hybrids, providing over 40% reductions of emissions and cost savings for fleet operators.

Range's electric propulsion assist system provides a streamlined and scalable approach to maximizing zero-emission heavy duty miles. Range trailers require zero modification to any existing tractors—enabling tractors to just hitch up and go. Our platform combines commercially-available components with innovative controls technology to maximize zero-emission range. This aligns with the goals of the Advanced Clean Fleet rule and can help maximize the deployment and utilization of zero-emission trucks, especially as barriers are being overcome, including infrastructure and charger availability.

We appreciated the opportunity to engage with staff during the process and urge the ARB to consider all possible solutions to reduce GHG emissions from this sector. We look forward to continuing to work with ARB as the ACF regulation is implemented and identifying opportunities to support technologies that maximize zero-emission miles within the heavy-duty sector.

Thank you again for the opportunity to provide our support for the ACF regulation. We commend the Board's leadership on this issue and urge the Board to move forward with adoption of the proposed regulation.

Sincerely,

A handwritten signature in black ink, appearing to read 'jchua', with a long horizontal flourish extending to the right.

Jason Chua
Chief Product Officer