

November 6, 2023
California Air Resources Board
1001 I Street
Sacramento, CA 95815

RE: 2023-24 Funding Plan for Clean Transportation Incentives

Dear California Air Resources Board Staff,

Zeem Solutions (Zeem) appreciates the opportunity to provide comments on the 2023-24 Funding Plan for Clean Transportation Incentives in support of Medium- and Heavy-Duty (MHD) zero-emission vehicle investments, particularly the investments in the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) and in the Innovative Small e-Fleets (ISEF) program. We encourage CARB to increase the funding allocation for these programs to ensure that this nascent market does not lose momentum. Now is not the time to dial back funding support as the established MHD ZEV goals and mandates would be harder to achieve.

Zeem offers charging, fleet management services, and electric vehicle leases that enable commercial fleets to transition to the zero-emission future easily and affordably. We build and operate zero-emission vehicle depots for commercial fleets throughout the country near ports, airports, and warehousing & distribution centers. With Zeem, fleets of all sizes can choose the exact class and configuration of vehicle they need and drive it under an all-in lease that includes supervised overnight charging, regular maintenance and cleaning, secure parking, and 24/7/365 operations at conveniently located mobility hubs.

To support ZEV deployment and the broader market ecosystem Zeem supports delaying the eligibility change in HVIP for private fleets of fifty (50) or more MHD vehicles to 2025 and the extension of the drayage plus-up until the end of 2024 or longer.

As a provider in the ISEF program, Zeem has seen firsthand how cost-sensitive small fleets are and how crucial it is to support their transition to ZEVs through the reduction in the upfront cost of vehicles. Zeem supports the proposed changes to the ISEF program including the alignment of the small fleet definition in HVIP and ISEF, expanded stacking eligibility, and funding standard purchases made through ISEF through the HVIP standard fund.

We urge staff to adopt the proposed budget to support fleets and companies who serve fleets. We look forward to working with staff and stakeholders to advance our common objective of decarbonizing transportation and enabling access to zero-emission transportation for fleets.

Sincerely,



Nicholas Raspanti

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