



ChargePoint, Inc.

240 East Hacienda Avenue | Campbell, CA 95008 USA
+1.408.841.4500 or US toll-free +1.877.370.3802

October 11, 2024

Carl Moyer Program Staff
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: **ChargePoint Comments Regarding Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines**

Dear Carl Moyer Program Staff,

ChargePoint, Inc. (ChargePoint) respectfully submits these comments to the California Air Resources Board (CARB) regarding the 2024 proposed revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program guidelines. We appreciate the opportunity to provide input on these important changes to this critical statewide program.

Founded in 2007, ChargePoint is a leading global electric vehicle charging network headquartered in Campbell, California. To date, we have delivered 269 million charges, thus enabling 11.4 billion electric miles and avoiding 461 million gallons of gasoline. At ChargePoint, EV charging is all we do, and we do it all. Passenger cars, delivery vehicles, buses, and more—we charge any EV, anywhere it goes. We have built a fully integrated portfolio of hardware, cloud services and support with the best technology in the industry. We offer solutions for home, government, multi-family, commercial, and fleet electric vehicle charging infrastructure. Additionally, ChargePoint has successfully deployed both level two and fast charging infrastructure along major highway corridors and within communities across the country while working in tandem with industry and government to enable a more accessible electric future. It is within the context of this experience and knowledge that we today provide our input on the proposed revisions to the Carl Moyer Program, California's flagship program for medium- and heavy-duty and off-road alternative fuel vehicles and infrastructure.

Please see our comments below:

Chapter 4: On-Road Heavy-Duty Vehicles

ChargePoint strongly supports CARB's proposed revision to increase the definition of "small fleet" from ten or fewer vehicles to twenty or fewer vehicles for purposes of determining increased funding amounts of up to 80% of vehicle cost. This expanded flexibility will serve to increase the number of small fleets participating in the Carl Moyer Program, thus enabling them to deploy clean vehicles at greater rates and leveling the playing field for these fleets that are often family-owned or small businesses that typically do not have the resources at their disposal to participate in such programs. CARB has recognized the importance of increasing small fleet participation in its incentive programs in recent years, and expanding the definition of small fleet for purposes of determining funding levels is among the most effective methods to encouraging these fleets' participation.

We also agree with staff's proposed change to add vehicle taxes, warranty, insurance, and transport fees as possible eligible costs for zero-emission (ZE) vehicle replacement projects. However, we recommend that these costs be included as eligible for all ZE replacement projects, and not just those that the administering air district determines to be suitable as incremental costs. This will ensure that all eligible fleets are able to rely on these costs being reimbursable under the Carl Moyer Program, rather than giving fleets a different program experience from air district to air district. CARB is well aware that insurance costs for ZE medium- and heavy-duty vehicles can be much higher than equivalent costs for internal combustion vehicles, given the relatively young age of this technology type, and doubtless understands that taxes on these vehicles, which still often have purchase prices twice to three times that of their traditionally fueled counterparts, can easily add up to tens of thousands of dollars, which can pose a real cost barrier to many fleets, especially small fleets. It is critical that these costs be eligible for participating fleets in all air districts, in addition to warranty costs and transport fees, to encourage small fleet participation in the Carl Moyer Program.

Chapter 10: Infrastructure

ChargePoint strongly supports CARB's proposed increase to the funding level for general charging infrastructure projects from 50% to 60% of eligible costs. This will encourage fleet participation in the Carl Moyer Program, particularly from small fleets for whom out-of-pocket costs consistently remain a barrier to program participation. Although ZE medium- and heavy-duty vehicles themselves are significantly more expensive than their internal combustion counterparts, charging infrastructure remains an additional substantial cost that often sees fleets covering an additional tens of thousands to even hundreds of thousands of dollars of project costs. We also support the proposed 15% incentive enhancement for public entity applicants, as this will provide a much-needed bonus to fleets that are typically more under-resourced than private, for-profit fleets. These funding level increases will allow the Carl Moyer Program to become even more effective, building on a legacy of over 25 years of transforming California's medium- and heavy-duty and off-road fleets.

We also support staff's inclusion of the NACS charging standard as an optional eligible charging protocol under the proposed changes to the program. Just as many of today's light-duty vehicle manufacturers have started moving towards the NACS standard, the medium- and heavy-duty vehicle industry may follow in the near future. We applaud staff for their foresight to include a standard as eligible under Carl Moyer that may be a prevalent charging protocol for many medium- and heavy-duty ZE vehicles in the coming years. This flexibility will allow the program to remain adaptable to potential changes in industry standards in the future and will avoid the need for further program revisions in a short period of time.

In conclusion, we thank you for the opportunity to comment on these important proposed revisions to California's flagship vehicle emissions reduction program and commend CARB staff for thoughtful, forward-thinking changes to this vital program. We look forward to ongoing collaboration with CARB to reduce carbon emissions through the continued electrification of our great state's transportation sector.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cecilia Coore".



Claire Garcia
Fleet Grant Development Manager
ChargePoint, Inc.
Claire.garcia@chargepoint.com