



September 21, 2018

California Air Resources Board
1001 I Street
Sacramento, CA 95812

RE: Innovative Clean Transit Proposed Regulation

Dear Chairwoman Nichols and Members of the California Air Resources Board,

Motiv Power Systems appreciates the opportunity to provide comments on the Innovative Clean Transit (ICT) proposed regulation. We strongly support the adoption and implementation of the ICT rule, as well as the goals of this regulation. Adoption of the ICT Rule as a key component of California's policy portfolio of solutions enabling a transition to zero emission vehicles to protect public health, our air quality, climate goals, and local jobs.

As a California based small business and manufacturer developing zero-emission all-electric chassis for medium- and heavy-duty vehicles, we know firsthand how essential good policy has been to supporting sustainable solutions and the advance technology ecosystem here in California. Motiv's all-electric chassis are presently used in vehicles ranging from school and shuttle buses to delivery trucks and work trucks, and even book mobiles and medical outreach vehicles, allowing fleets zero-emission solutions that improve the local air quality, help meet the state's climate goals, and eliminate the need for fossil fuels.

We strongly support adoption and implementation of a robust ICT rule, and the goal to have a 100% zero-emission fleet by 2040. These targets are reasonable, feasible, and appropriate to ensure transit riders see the opportunities to enjoy zero-emission vehicles in their communities. We would like to align ourselves with the analysis in the letter submitted to the docket by the Sierra Club in collaboration with Earthjustice, The Union of Concerned Scientists, Environment California / Environment California Research & Policy Center, The American Lung Association in California, IBEW-NECA California & Nevada, International Brotherhood of Electrical Workers (IBEW) Local 11, Los Angeles NECA, IBEW Local 569, Jobs to Move America, The Coalition for Clean Air, BlueGreen Alliance, and CALPIRG. This letter and it's analysis contain three recommendations we strongly support and agree with:

1. This rule should contain specific language that requires that all buses must be zero emissions by 2040 and thereafter.
2. Cutaways and other bus types not presently included should be added to the requirement two years after two commercial offerings have completed Altoona testing.
3. Small transit agencies should complete their planning by 2021.

These recommendations when coupled with the framework staff has already proposed will ensure the smoothest transition to only zero-emissions solutions, on all vehicle platforms, and for all Californians no matter where in our great state they reside.

As a manufacturer of zero-emission chassis that can be used in cutaway applications and have been in use for the last three years, we know first-hand the timelines for procurement and contracts with



transit agencies are longer than with private fleets. If this rule is passed including transit agency planning as well including more vehicle applications when there are multiple validated commercial solutions, it will increase the incentive to complete additional testing to sell into those markets. And in doing so it accelerating the deployment of zero-emission shuttle bus solutions into transit fleets.

Furthermore, there is a difference in the amount of planning that will be needed for a fleet transformation when compared to selling a single vehicle. While selling a single bus for vehicle validation, a deployment can often be done without major infrastructure investments. However, a total agency transition will involve the need for power upgrades and service planning with utilities – and actively planning will make the transition smoother and more successful. This will also help utilities ensure their planning to meet renewable targets aligns with the power needs of the buses being put into service.

Motiv also strongly supports the continued access and funding of incentive programs through the length of this transition. Programs like HVIP and the LCFS credits are key for transit agencies and enabling them to use these tools for the length of the transition will allow smoother planning and faster transition to 100% zero-emission solutions.

As a company, Motiv's mission is to **Free Fleets From Fossil Fuels**. This regulation supports that mission, so while we do not currently sell to these fleets, we support the policies that allow them to take actions that align with our mission. Historically California's gains in clean transit technology have set the stage for transformations that impact other fleets, and this leadership and California's ongoing commitment to being a climate leader, investing in advanced technologies, and supporting communities are key to what has made California the hub of technological leadership in automotive technology. As a company part of this ecosystem we recognize the integrated nature of the policy portfolio and its successes to date and encourage the CARB board to pass this regulation to continue that leadership.

Thank you for the opportunity to provide feedback and we look forward to continuing to work with staff and stakeholders in support of California's clean air and climate goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Urvi Nagrani". The signature is fluid and cursive, written over a white background.

Urvi Nagrani
Director of Business Development
Motiv Power Systems