



September 24, 2018

Mary D. Nichols
California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Amply strongly supports the CARB proposed regulatory action on Zero Emission Buses for transit agencies under the Innovative Clean Transit regulation.

Dear Chair Nichols:

AMPLY Power, Inc. (AMPLY), a California-based provider of electric vehicle charging services for fleets, strongly supports the California Air Resources Board (CARB) proposed regulatory action on Zero Emission Buses (ZEBs) for transit agencies under the Innovative Clean Transit (ICT) regulation. We support your proposed regulatory action because it will accelerate the transition to ZEBs, which will help California meet its climate change goals and provide substantial environmental and health benefits to our state. AMPLY is submitting this comment to demonstrate industry support for your proposed regulatory action and show that there are companies prepared to help transit agencies implement your rule by making the transition to ZEBs as seamless as possible.

Companies such as AMPLY in the EV industry may help transit agencies comply with CARB's proposed regulatory action because we share common goals and provide solutions to certain compliance challenges. AMPLY shares similar goals to your proposed regulatory action because we aim to accelerate transportation electrification.

AMPLY may help transit agencies comply with CARB's proposed regulatory action by providing solutions to new challenges in the transition to ZEBs as electricity becomes the new fuel in transportation. For instance, in a high-powered application like EV fast charging, the difference between controlled, optimally balanced versus unrestrained charging could be 3X in cost.

AMPLY is uniquely positioned to facilitate the transition and mitigate electricity cost impacts to fleet operators. As transit agencies across California design their rollout plans and purchase ZEBs, our management solutions will help by giving EV fleet managers certainty on electric fueling costs. AMPLY builds facility-wide, fully automated charging systems optimized for lowest electricity cost, while delivering a usage-based service offering to our customers. AMPLY provides a modular, fully autonomous charging solution that scales with the growth of our EV

fleet and transit agency customers. By optimizing charge rate and vehicle process flow, AMPLY flattens out the facility demand curve and thereby provides the lowest cost of electric fueling possible in a given depot location or in-route bus stops.

Furthermore, our model is distinctively designed to offer customers a high mix of renewable supply, which facilitates the growth of zero-carbon sources for electric charging and will help California reach its climate goals.

AMPLY urges CARB to adopt the proposed regulatory action because the market is ready and the timing is critical. AMPLY agrees with CARB's assessment of the market for ZEBs. We engage regularly with ZEB stakeholders such as bus manufacturers, utilities, electric vehicle supply equipment providers, and share the conclusion that a viable ZEB market exists now.

Moreover, CARB's proposed regulatory action is more important than ever because California has recently announced its most ambitious climate goal yet. In addition to the California climate goals outlined in your notice, after it was issued, Governor Brown signed Executive Order B-55-18, which commits California to economy-wide carbon neutrality by 2045. Your proposed regulatory action is crucial to meeting California's climate goals, particularly the new carbon neutral goal.

AMPLY strongly endorses CARB's proposed regulatory action on ZEBs, and we urge you to adopt it immediately.