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October 10, 2024

California Air Resources Board (CARB)
1001 I Street,
Sacramento, CA 95814

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

Introduction

Terawatt Infrastructure (Terawatt) thanks the California Air Resources Board (CARB) for the opportunity to submit comments in regards to Proposed Revisions to the Carl Moyer Memorial Air Quality Standards Attainment Program Guidelines.

Terawatt Infrastructure (Terawatt) is a California-based company building a nationwide network of charging solutions for light-, medium-, and heavy-duty fleet vehicles. Terawatt provides convenient, reliable charging infrastructure that keeps fleets running efficiently. We own, develop, operate, and maintain charging sites and operational solutions that form the backbone of commercial EV transport in the U.S., and have raised more than \$1 billion to deliver our national network.

We provide these comments informed by our experience developing and deploying charging infrastructure for commercial fleets, with 15 sites announced and 2 currently operational in California. We have built our network to ensure that sufficient charging capacity is available to zero-emission fleets, especially heavy duty truck fleets.

The Carl Moyer Program has been critical to the reduction of transportation emissions in California through the zero-emission vehicles and infrastructure projects it has funded. CARB's proposed changes to the program enhance the flexibility and the impact of these funds, which have accelerated the deployment of heavy duty vehicles across California. Please see the following pages for more detailed comments.

For more information, please contact:

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Comments

Terawatt thanks CARB for their leadership in continued support of this program, as well as its willingness to take an iterative approach to Carl Moyer program design.

Terawatt offers the following comments to the proposed guidelines:

Chapter 4: On-Road Heavy-Duty Vehicles

Terawatt supports the changes that CARB has proposed in this new guidance.

The allowance of lease to own will provide a means for small fleets to utilize the Carl Moyer program where it may have been more difficult previously. The allowance of extended warranties, taxes, and insurance under Carl Moyer will also enable fleets to accommodate additional costs for a zero-emission vehicle that they were previously bearing directly.

Terawatt also supports the changes to the Vehicle Incentive Program (VIP) to allow 20 or less vehicles to be eligible for a maximum of 80 percent of vehicle cost (versus 10 or less vehicles), which aligns Carl Moyer funded projects with other California funding programs, providing for greater stackability or flexibility.

Terawatt supports the Carl Moyer program's continued allowance of fleets of funding for over 20 vehicles. The incremental cost difference between a conventional vehicle and a zero emission vehicle remains significant, and fleets of all sizes - whether they are small fleets or high-priority fleets - benefit from access to incentive funding to purchase zero-emission trucks. Given that the HVIP program continues to exclude a significant portion of the California truck fleet from accessing any incentive funds, it is important to continue support for larger fleets at this nascent point in the zero-emission transition, even if the Carl Moyer program, like other California programs, continues to exclude funding to fleets to meet compliance with regulatory requirements.

Chapter 10: Infrastructure

Terawatt supports the expansion CARB has made to air district flexibility to implement the Carl Moyer Program for infrastructure, such as increased funding levels, updating project criteria for added flexibility, streamlining co-funding requirements, and increasing types of eligible costs. The proposed program allows up to 60% of the cost of the project to be covered by a Carl Moyer grant. The program's new guidelines allow an additional 10% incentive for projects with renewable solar or wind power systems, a 10% additional incentive for applicants of heavy-duty truck parking facilities that provide communal charging opportunities (e.g., truck yards, truck depots, truck stops, etc) and a 10% additional incentive for projects located near sensitive receptors. These program guideline changes will encourage the participation of additional shared-use commercial

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charging facilities that are critical to meeting fleet charging demands, as well as ensuring that their power needs are mitigated by on-site generation.

The current 10% additional incentive for on-site solar/wind generation requires *'at least 50% of the total annual energy provided to covered sources by the project must be generated from solar/wind.'* Terawatt suggest reducing this 50% percentage requirement as achieving this figure will be difficult for sites with a significant amount of power (such as for commercial truck fleets) and also difficult to achieve in dense urbanized areas, as real estate costs may preclude larger on-site solar/wind projects that can supply 50% of energy needs. A lower percentage will still incentivize the use of on-site generation and reduce reliance on the grid.

