



January 7, 2022

California Air Resources Board
Low Carbon Fuel Standard Program
1001 I St. Sacramento, CA 95814

Re: Potential Future Changes to the Low Carbon Fuel Standard Program (LCFS)

Zeem Solutions (Zeem) appreciates the opportunity to provide comments on the potential future changes to LCFS to support fleets, independent owner-operators, and the parties that serve them. Zeem applauds California Air Resources Board (CARB) for their work on LCFS and fully supports the continuation of the program.

Zeem provides long-term leasing, servicing, maintenance, parking, charging, and energy storage at our shared depot facilities for small and medium-sized fleets of medium and heavy duty (MHD) vehicles. Our goal is to transform the commercial electric vehicle ecosystem by offering affordable clean vehicle fleets across the country. Zeem focuses on fleets that have previously been unable to access support, especially those in underrepresented communities to accelerate the adoption of zero-emission transportation as well help California meet its zero-emission vehicle (ZEV) and climate goals.

Energy Efficiency Ratio (EER)

The current EER data groups all Class 4-8 electric vehicles in one category. This approach deflates credit generation for vehicle classes with the most efficient EERs and inflates credit generation for vehicle classes with less efficient EERs. Zeem suggests:

- Reframe electric vehicle (EV) EER with Class 4-6 vehicles in one category and Classes 7-8 vehicles in a second category
- Data to support these new EER categories already exists; many fleets have been operating Class 4-6 vehicles and demonstrated higher EERs than LCFS awards
 - For example, [GreenPower's EV Star Cargo \(Class 4\)](#) gets 48 MPGe and [Lightning E Motors' Transit Passenger Van](#) gets 61 MPGe. [The DOE has calculated the miles per gallon for delivery trucks to be 6.5 and shuttles as 7.1](#) so the EER for this vehicle would be 7.4 and 8.7 (MPGe/6.5 or 7.1) respectively. However, the current categorization means these vehicles are considered to have a significantly lower EER of 5.
- This simple change incentivizes medium-duty electrification, arguably one of the fastest growing parts of the industry, with last-mile delivery anchoring the segment. It is critical to make sure that LCFS properly incentivizes using electric vehicles, especially in communities hardest hit by pollution.

Thank you for the consideration of our comments. We look forward to continuing to work with CARB staff in the future to improve air quality through cleaner transportation.

Sincerely,

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