



ADVANCED ENERGY MACHINES

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Chair Mary Nichols and Members of the Board
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Proposed Community Air Protection Funds Supplement to the Carl Moyer Memorial Air Quality Standards Attainment Program 2017 Guidelines

Dear Chair Nichols and Members of the Air Resources Board

Advanced Energy Machines supports the Proposed Community Air Protection Funds Supplement to the Carl Moyer Memorial Air Quality Standards Attainment Program 2017 Guidelines (Carl Moyer Program Supplement) that incentivizes zero- and near zero- refrigerated transport solutions to reduce near-term local mobile source emissions and statewide greenhouse gas emissions. We applaud Staff's clarification of eligibility requirements for transport refrigeration units (TRUs).

TRUs congregate and are concentrated in large numbers at warehouses, distribution centers, food manufacturers, cold storage warehouse, terminals and other freight facilities commonly near or in disadvantaged communities. The California Sustainable Freight Action calls for zero-emission transport refrigeration; we're pleased that resources and incentives could be available to encourage fleets to make the transition to zero emission transport refrigeration.

We applaud Staff's recommendation to clarify eligibility of zero-emission all-electric TRUs within the Carl Moyer Program guidelines. Similarly, we support the additional ten percent increase to the maximum percentages of eligible costs covered by the program for infrastructure. Frequently multiple electrified TRU spaces must support a large distribution center or freight facility as TRUs are often staged (pre-cooled) in one area, loaded at other areas, and staged again prior to dispatch. Therefore, enhanced funding benefits the implementation of clean all-electric transport refrigeration.

The guideline modifications and allowance to provide a larger funding share for transport refrigeration units will support and accelerate the adoption and implementation of this readily available near-term solution.



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Advanced Energy Machines appreciates the opportunity to express our support for the Proposed Community Air Protection Funds Supplement to the Carl Moyer Memorial Air Quality Standards Attainment Program 2017 Guidelines. Please contact me with any questions. Thank you for your time and thoughtful consideration of this matter.

Sincerely,
Advanced Energy Machines

Ronald Koelsch, Ph.D.