



April 7, 2023

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

RE: Proposed 15-Day Changes to the Proposed Advanced Clean Fleet Regulation Order

Dear California Air Resources Board Staff,

Thank you for the opportunity to provide feedback on the recently released proposed 15-day changes to the Proposed Advanced Clean Fleet Regulation Order.

We write as an informal coalition of California-based companies working to provide the charging infrastructure and services necessary for the transition of medium and heavy duty vehicles to zero-emission. We support the proposed changes to the ACF, and appreciate the California Air Resources Board (CARB) commitment to electrification and eliminating mobile emissions from medium- and heavy-duty trucks.

Forum Mobility, headquartered in Oakland, California, provides turn-key zero-emission trucking solutions to help accelerate the deployment of zero-emission drayage trucks throughout California. Many smaller fleets and independent owner operators face barriers to adoption, including awareness of zero-emission vehicle options, the high up-front cost, navigating the incentive programs, and installing the associated infrastructure. Forum helps overcome these barriers to adoption by developing, building, and operating the charging infrastructure, as well as purchasing and leasing class 8 zero-emission electric trucks – with the ability to secure available incentives to pass along to the truck driver or fleet owner. Forum provides a one-stop solution for a monthly fee for 'charging as a service' and/or 'truck as a service.' We currently have upwards of 20 depots in development in and around the ports of Oakland, Long Beach, and Los Angeles, and along corridors to common freight destinations.

EV Realty develops, deploys and owns multi-fleet EV charging hubs for commercial fleets in California and nationally. EV Realty's hubs provide charging solutions for multiple fleet operators in grid advantaged locations that maximize existing utility infrastructure to efficiently and expeditiously support the transition to a zero emissions vehicle future.

TeraWatt Infrastructure owns, operates, and provides high-powered EV charging solutions for light-, medium- and heavy-duty commercial fleet vehicles. The company is building large-scale EV charging sites to power electrified commercial fleets within urban metros, along key freight corridors, and in close proximity to intermodal transfer points.

As a group, we appreciate the proposed changes included within the 15-day language. Specifically, we thank ARB for the inclusion of language that helps clarify the applicability of infrastructure delay extensions to parties providing “infrastructure as a service.” Third-party charging depots that provide “charging or infrastructure as a service” to support independent owner operators face the same potential for vehicle delivery delays, infrastructure construction delays, and site electrification delays as large fleets that build behind the fence charging on their own property.

We also would like to take this opportunity to make the case that successful implementation of the ACF will take a lot of additional policy changes. Rewiring and repowering California to run on ZEVs will be a huge undertaking, requiring immense investments from millions of people and businesses, big and small, that are involved in goods movement in the world’s 5th largest economy. Livelihoods are at stake, and failure to successfully navigate this transition will imperil the lifeblood of our state and national economy. CARB itself must use all the tools at its disposal to help support the success of this endeavor. The biggest and most important matter to address this is to revamp the Low Carbon Fuel Standard (LCFS).

The biggest challenge presented by the current state of the LCFS is that credit values are currently around \$70, down from recent highs of \$200. The total cost of ownership (“TCO”) analysis in Appendix G of the proposed ACF regulation projects LCFS credit value of \$200 until 2030 – indeed, at that level ZEVs can compete quite favorably with diesels on a TCO basis. Action to return values to those levels will be crucial. Secondly, establishing a robust Fast Charger Incentive (FCI) for MHD is one of the most important things that CARB can do to accelerate the speed and scale of charging infrastructure deployment. Doing so would incentivize charging infrastructure to be deployed in advance of vehicles, removing a key obstacle to fleet transition.

Thank you again for the opportunity to provide our comments and support for the ACF regulation and recent changes. We urge the Board to move forward with adoption of the proposed regulation.

Sincerely,

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