



November 20, 2018

California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

RE: Innovative Clean Transit Proposed Regulation

Dear Chairwoman Nichols and Members of the California Air Resources Board,

Motiv Power Systems appreciates the opportunity to provide further comments on the Innovative Clean Transit (ICT) proposed regulation. We strongly support the adoption and implementation of the ICT rule, as well as the goals of this regulation. Adoption of the ICT Rule as a key component of California's policy portfolio of solutions enabling a transition to zero emission vehicles to protect public health, our air quality, climate goals, and local jobs.

As a California based small business and manufacturer developing zero-emission all-electric chassis for medium- and heavy-duty vehicles, we know firsthand how essential good policy has been to supporting sustainable solutions and the advance technology ecosystem here in California. Motiv's all-electric chassis are presently used in vehicles ranging from school and shuttle buses to delivery trucks and work trucks, and even book mobiles and medical outreach vehicles, allowing fleets zero-emission solutions that improve the local air quality, help meet the state's climate goals, and eliminate the need for fossil fuels.

We strongly support adoption and implementation of a robust ICT rule, and the goal to have a 100% zero-emission fleet by 2040. These targets are reasonable, feasible, and appropriate to ensure transit riders see the opportunities to enjoy zero-emission vehicles in their communities. We would like to align ourselves with the analysis in the letter submitted to the docket by the Sierra Club in collaboration with Earthjustice, The Union of Concerned Scientists, Environment California / Environment California Research & Policy Center, The American Lung Association in California, IBEW-NECA California & Nevada, International Brotherhood of Electrical Workers (IBEW) Local 11, Los Angeles NECA, IBEW Local 569, Jobs to Move America, The Coalition for Clean Air, BlueGreen Alliance, and CALPIRG. The ongoing collaboration of stakeholders in the process of this rulemaking has created a rule that will work for California. We commend CARB staff for ensuring these stakeholders, fleets, and manufacturers all have had a voice in this process.

While there have been some compromises as to the stringency of this rule, it is more important to finalize it now and begin the work of deploying vehicles, rather than to continue to have the rule tweaked further. As I type this, the reality of climate change is apparent state wide with toxic air and raging fires. Our actions are urgently needed, as delays in implementing solutions make the scale of the problem harder to address.

As a manufacturer of zero-emission chassis that can be used in cutaway applications and have been in use for the last three years, we know first-hand the timelines for procurement and contracts with transit agencies are longer than with private fleets. We need those fleets to begin the work of moving

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away from fossil fuels today. There is a difference in the amount of planning that will be needed for a fleet transformation when compared to selling a single vehicle. While selling a single bus for vehicle validation, a deployment can often be done without major infrastructure investments. However, a total agency transition will involve the need for power upgrades and service planning with utilities – and actively planning will make the transition smoother and more successful. This will also help utilities ensure their planning to meet renewable targets aligns with the power needs of the buses being put into service.

As a company, Motiv's mission is to **Free Fleets From Fossil Fuels**. This regulation supports that mission, so while we do not currently sell to these fleets and the vehicle applications we do sell were not included in this rule, we still strongly support the policies that allow transit fleets to take actions that align with our mission. Historically California's gains in clean transit technology have set the stage for transformations that impact other fleets, and this leadership and California's ongoing commitment to being a climate leader, investing in advanced technologies, and supporting communities are key to what has made California the hub of technological leadership in automotive technology. As a company which is part of this ecosystem we recognize the integrated nature of the policy portfolio and its successes to date and encourage the CARB board to pass this regulation to continue that leadership.

Thank you for the opportunity to provide feedback and we look forward to continuing to work with staff and stakeholders in support of California's clean air and climate goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Urvi Nagrani". The signature is fluid and cursive, written over a light blue horizontal line.

Urvi Nagrani  
Director of Business Development  
Motiv Power Systems