

November 4, 2021

California Air Resources Board
1001 I Street
Sacramento, CA 95815

Re: FY 21-22 Low Carbon Transportation Funding Plan

Dear California Air Resources Board (ARB) Members,

Zeem Solutions (Zeem) appreciates the opportunity to provide comments in strong support of the FY 21-22 Low Carbon Transportation Funding Plan. We thank ARB for recognizing the need to accelerate small fleet adoption of zero-emission medium- and heavy-duty (M/HD) vehicles by creating an Innovative Small e-fleets Pilot (ISEP) set-aside within HVIP to implement targeted strategies to support small fleets.

Zeem Solutions provides turn-key services to accelerate the deployment of M/HD zero-emission vehicles (ZEVs) for commercial fleets throughout California, with a focus on supporting small fleets and independent operators who comprise the vast majority of the M/HD market. Zeem enables fleet operators to transition from diesel to zero-emission through cost-effective financing options, exchanging the high upfront capital expense of vehicle and infrastructure acquisition for an immediate operational savings through a three-to-five-year vehicle lease with a manageable, fixed monthly rate covering the vehicle, charging, servicing, parking, energy storage, and reporting requirements for funding programs as an all-in-one solution. Zeem has a unique understanding of the challenges facing small fleets and has developed its service offering through detailed discussions with over 5,000 fleets across California – 94% of which have 100 or fewer vehicles and 60% of which have explicitly expressed interest in transitioning their fleets to commercial ZEVs.

Zeem strongly supports the proposed heavy-duty and off-road investments included in the Low Carbon Transportation Funding Plan. Specifically, Zeem supports the proposed allocation of \$570 million for the HVIP program, including the \$25 million set aside for innovative small e-fleets. By dedicating this set-aside funding for small fleets, HVIP can position itself to better address the unique needs of this traditionally underserved group and support their transition to zero-emission vehicles. Innovative “fleet-as-a-service” market solutions will be instrumental in helping California achieve its ZEV adoption and deployment projections for the M/HD vehicle sector and an effective way to leverage public and private investment, particularly in disadvantaged communities. We look forward to participating in upcoming ISEP work groups and to continuing to work with ARB to develop and demonstrate the need to allocate additional funding to support small fleets in future years.

Zeem appreciates the opportunity to provide support for the proposed FY 21-22 Low Carbon Transportation Funding Plan. We look forward to continuing to work together to achieve the





state's transportation electrification and greenhouse gas emission reduction goals, as well as support small fleets transition to zero-emission vehicles.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Trowbridge'.

Bonnie Trowbridge
Director, Policy and Communications

