

## NESCAUM Multi-State ZEV Action Plan

To whom it may concern:

Zeem Solutions is pleased to support and provide comment on the NESCAUM Multi-State ZEV Action Plan. We are encouraged by the comprehensive approach that the ZEV Task Force employed for this strategic initiative. Collaboration is essential for the widespread electrification of medium- and heavy duty (MHD) vehicles. The Action Plan will serve as a resource for state and local governments to develop favorable ZEV policies, encourage private sector growth and provide significant social, economic, and environmental benefits.

Zeem's mission is to transform the way fleets operate by providing affordable solutions for zero emission transportation that improve air quality within our communities. We build and operate zero-emission vehicle depots for MHD fleets throughout the country. Our basic depot services include vehicle leasing, vehicle charging, secured parking, vehicle maintenance, lounge space for drivers and opportunity charging. We specialize in working with small fleets to provide equitable access to zero-emission vehicles and infrastructure creating economic savings and environmental benefits. We currently have an operational depot facility in Inglewood, California within minutes' drive of Los Angeles International Airport (LAX). Shuttle, last-mile delivery, and additional MHD commercial fleets are among the customers utilizing our infrastructure and operating out of the depot. The depot will ultimately have 77 fast charging ports and 53 Level 2 chargers for a total of nearly 8MW of charging power by the fall of 2022. The LAX branch will accommodate more than 200 MHD EVs domiciled on-site and support hundreds and potentially thousands more with high-speed opportunity charging.

Partnerships with government entities and utilities are key components of our business planning and depot development strategies. Government and utility support are essential to balance the risk, complexity and uncertainty and the industry's overall success in the nascent market for MHD EVs and EV charging. A combination of vehicle subsidies, utility incentives, clean fuel standards and clean truck or fleet regulations are all important policies that support depot projects in strategic locations. Zeem Solutions strongly supports several of the the strategies and recommendations outlined in the Action Plan. We are a private sector conduit to help and collaborate with government, and public stakeholders as well as community groups near our depot facilities. All of our depots will serve as hubs of clean energy technology for vehicles, charging infrastructure, battery storage, and grid services. The following comments provide recommendations to strengthen the Action Plan and support the overall successful transition to zero emission mobility in the United States.

- *Sales and Fleet Purchase Requirements* – Regulatory mandates are critical to catalyze and accelerate MHD vehicle deployment but need to be implemented systemically with supportive subsidies and incentives.
- *Private Sector Collaboration* – Active feedback and direct participation from the trucking industry and fleet operators are essential components to craft equitable policies across the commercial vehicle spectrum.
- *Electric Utility and Utility Regulator Actions* –Southern California Edison's Make Ready program enabled Zeem to deploy infrastructure and serve our fleet customers. Similar programs should continue to be developed throughout the country in alignment with air quality, climate, and transportation electrification goals.
- *Vehicle and Infrastructure Purchase Incentives* – Zeem encourages other purchase incentive programs to specifically consider small fleets. One example is the Innovative Small E-Fleet Program (ISEF) set-aside through CARB's HVIP program. Over 90% of fleets are small



businesses yet small- and medium-sized fleets have historically been unable to access incentives to enable the transition to zero-emission vehicles.

- *Economic Equity for Workers* – Zeem is committed to working with workforce development organizations and offer career opportunities to individuals within our communities. Favorable programs will help these efforts actively attract and develop both existing and new jobs to support the clean energy economy without leaving anyone behind.
- *State and Local Cooperation* – It is important for government entities to use the Action Plan as a reference point for common ground. Consistency is key and operating in silos will negatively impact widespread MHD vehicle electrification.

The ZEV Task Force and participating jurisdictions are leading the way to help move the transition forward collectively. We are grateful for your consideration, encouraged by the vision of the Action Plan, and remain committed to collaborate with all the stakeholders involved in this initiative.

Please feel free to reach out with any questions or requests for additional information.

Sincerely,

Paul Gioupis  
CEO  
Zeem Solutions, Inc.