



July 18, 2013

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed AB 118 Air Quality Improvement Program Funding Plan for Fiscal Year 2013-14

Dear Chairman Nichols:

Boulder Electric Vehicle supports the goals of the AQIP program overall and believe these investments are helping to accelerate the transformation of the transportation sector in California. We are particularly interested in the Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP) and are writing to provide comments on this program. HVIP is currently oversubscribed and will have to be consistently funded at higher levels in order to accelerate the development and deployment of near- and zero emission trucks and buses. We support the proposed \$5 million allocation for this program, but note that this amount is not sufficient to meet needs.

HVIP is a Valuable and Successful Program

Trucks are an increasingly important area for California climate and criteria emissions, particularly in goods movement. Cleaner trucks and buses are essential if California wants to meet its near- and long-term emissions goals. HVIP is one of the few tools driving early deployment of the advanced zero- and near-zero technologies the state needs in trucks.

As a leading market in the United States for electrification of transportation, Boulder Electric Vehicle has elected to expand manufacturing capabilities in Chatsworth California. Customer deployment has remained focused on the California market due to the presence of the HVIP program. While the overall benefits of driving under electric power are evident, the upfront cost of these new vehicles is seen as a prohibiting deployment factor. As such the HVIP dollars have assisted companies make the commitment to spending significant dollars in replacing some of the most pollutant vehicles on California roads. Boulder is committed to increasing manufacturing in California to hundreds of vehicles per year in the near term to fill customer projected orders.

Making a business case for advanced technologies is critical to commercial fleets purchasing vehicles. This is why HVIP is so important. The program directly reduces the cost of hybrid and zero emission trucks and buses right at the point of purchase. This is a model that works and it is supporting the early market in California. To date, roughly 1700 hybrid and electric truck and bus purchases have been driven by HVIP funding, a big percentage of these vehicles on the road in the US. The program has won an



award and is being copied in other states and regions, with New York and Chicago both implementing HVIP-style programs.

HVIP incentives are tremendously important to the early market for clean, advanced technology trucks and buses. It is important to note that there are NO federal or other incentives for these vehicles. State and local incentive such as HVIP are the only real market drivers. In time, HVIP incentives will help reach economies of scale, prices will come down, and the need for incentives will go away. However, we are not yet at that point for commercial vehicles. Consistent and predictable HVIP funding is essential at this critical time in market development.

HVIP Funding Shortfalls and Program Suspensions are Slowing Market Growth

Continuity and consistency are highly critical in the commercial vehicle sector because of longer procurement timelines. HVIP has been providing a strong market signal in recent years, but the program is currently out of funds and suspended until FY 2013-14 funds are made available. This program suspension and lack of consistency is very damaging for the market. In order to ensure continued progress in this sector, HVIP funding should be re-established as soon as possible.

The \$5 million in proposed funding for HVIP is necessary but not sufficient for FY 2013-14. The Funding Plan estimates demand for the year at \$12-25 million, suggesting that the shortfall for this year is at least \$7 million. In order to maintain momentum and avoid another program suspension, it will be important to identify additional funding for the HVIP program.

We recognize that resources are limited and that the Funding Plan was developed assuming just \$25 million in revenues for the AQIP program. We also understand there are many competing priorities for these funds and we realize that the light duty Clean Vehicle Rebate Project (CVRP) is also oversubscribed. We believe staff has struck a good balance in this plan, setting aside \$5 million for HVIP and \$10 million for CVRP, with a reserve of \$5 million. Our goal in providing these comments is to underscore the importance of the HVIP program and the benefits it provides. We are committed to working with you to ensure that HVIP continues to support the growth of the market for zero- and near-zero emission trucks and buses in California.

Sincerely,

A handwritten signature in black ink, enclosed within a red rectangular border. The signature appears to read 'Carter Brown'.

Carter Brown
Chief Executive Officer

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