DOCKETED	
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Project Title:	Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure
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Document Title:	HummingbirdEV Comments on Medium- and Heavy-Duty Zero-
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Comment Received From: Rakesh Koneru

Submitted On: 11/8/2019 Docket Number: 19-TRAN-02

Humming birdEV Comments on Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Additional submitted attachment is included below.



November 8, 2019

California Energy Commission 1516 9th Street Sacramento, CA 95814

Re: Docket No. 19-TRAN-02 – Concepts for Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure

Dear Energy Commission Staff,

Thank you for the opportunity to provide comments on the proposed concepts for medium- and heavy-duty zero-emission vehicles and infrastructure as part of the California Energy Commission's Clean Transportation Program. HummingbirdEV strongly supports the adopted Investment Plan that provides funding for medium- and heavy-duty zero-emission vehicles and infrastructure.

HummingbirdEV, headquartered in Livermore, California, is an experienced engineering and manufacturing electric vehicle powertrain provider. We specialize in medium- and heavy-duty electric powertrains and provide innovative well-to-wheel solutions, with a unique onboard fast-charging EVSE, vehicle-to-vehicle (V2V) and vehicle-to-grid (V2G) technologies for on- and- off-road zero-emission heavy-duty vehicles, and are focused on serving disadvantaged communities in the San Joaquin Valley. The HummingbirdEV team has a proven track record in the development and scaled deployment of battery-electric trucks and other zero-emission vehicles, which have collectively accumulated more than 8 million zero-emission miles throughout California and beyond.

HummingbirdEV supports staff's proposal to fund infrastructure for mediumand heavy-duty infrastructure and vehicles. Our specific comments include:

1. Within these investments, we recommend expanding the eligible sectors to specifically include agricultural equipment and vehicle infrastructure. There are many specialty vehicles that operate in the agriculture industry which serve multiple purposes, including crop harvesting, transport, maintenance, and many others. These operations, often in rural areas, lack access to reliable electric charging infrastructure and there is a need to support the efforts of these industries to electrify. Supporting this sector will also improve air quality in some of the state's most air quality burdened communities, including the San Joaquin Valley.

- 2. We also support expanding funding to other on-road sectors, such as such as infrastructure for delivery fleets including food processing, packaging, and warehouse delivery, as well as cites/counties, universities, emergency response, and other end-users. There has been significant progress in the commercialization of zero-emission delivery and specialty vehicles that can serve these fleets, such as grocery delivery, fire trucks, utility vehicles, maintenance equipment, and much more, that should be able to access funding for infrastructure to help increase opportunities to eliminate emissions from more medium- and heavy-duty sectors.
- 3. We also respectfully request including funding for innovative charging infrastructure models that can help reduce the demand on the grid. HummingbirdEV developed an innovative onboard fast charging system eliminates most of the landside charger equipment and opens much more of the grid to serve the transportation sector. The breadth, seamlessness, and flexibility of the new charging opportunities that this opens—without the need for traditional landside superchargers—offers truly transformative opportunities to make zero-emission freight and zero-emission agriculture as convenient as refueling with fossil fuels.

HummingbirdEV appreciates the opportunity to provide feedback on the Energy Commission's initial proposed concepts for medium- and heavy-duty zero-emission infrastructure. We look forward to continuing to work together to deploy zero-emission vehicles and infrastructure.

Sincerely,

Rakesh Koneru

COO, HummingbirdEV