June 10, 2026

California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted electronically via: https://carb.commentinput.com/?id=P98d6cA7b

Re: CalETC's Comments on the Proposed AQIP Funding Plan for Fiscal Years 2025-2026 and 2026-2027

Dear Chair Sanchez and Board Members:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide our comments on the Proposed Air Quality Improvement Program (AQIP) Funding Plan (Funding Plan) for fiscal years 2025-26 and 2026-27. CalETC greatly appreciates CARB's work on these critical zero-emission transportation programs and your willingness to take feedback from stakeholders on these important issues.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, and other industry leaders supporting transportation electrification.

CalETC supports the proposed Funding Plan. We recognize CARB must make difficult decisions with limited funding for these critical ZEV programs. We will continue to fight hard in the legislature for increased funding for light-, medium- and heavy-duty ZEVs in this year's budget. We recognize that HVIP currently has funding remaining for standard vouchers and other set asides, so we understand CARB's decision to allocate the available AQIP funding to the CORE program because it is currently out of funding. We continue to recommend keeping a close eye on HVIP funding throughout the year because HVIP is the primary driver for MHD ZEV on-road deployment and sustainable funding is critical given the significant uncertainty the MHD ZEV industry has experienced recently.

Additionally, we recommend considering increasing HVIP's 20 voucher cap on fleets. Increasing the cap would allow those fleets that are ready and willing to purchase ZEV trucks to access HVIP and place those orders. We believe that by increasing the voucher cap, HVIP can help drive scale for ZEV trucks that can hit the road today and begin to reduce emissions. That said, we are concerned that increasing the voucher cap may allow orders to be placed for trucks that would not be delivered for a significant amount of time, e.g., longer than the 540-day delivery requirement. Therefore, we recommend considering how best to ensure vouchers are used for ZEV trucks that can be delivered quickly or at least meet the 540 calendar day deadline. Increasing the voucher cap for trucks that can be delivered soon will help truck manufacturers drive scale and bring costs down.

We greatly appreciate CARB's dedication to leading California to a zero-emission future and thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions at kristian@caletc.com.

Sincerely,

Kristian Corby
Deputy Executive Director
California Electric Transportation Coalition