SENATE COMMITTEE ON ENVIRONMENTAL QUALITY Senator Allen, Chair 2021 - 2022 Regular

Bill No:	SB 726		
Author:	Gonzalez		
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Urgency:	No	Fiscal:	Yes
Consultant:	Paul Jacobs		

SUBJECT: Alternative fuel and vehicle technologies: transportation sustainability strategy

DIGEST: Requires the development of a comprehensive transportation sustainability strategy and requires the California Air Resources Board (ARB) to set a greenhouse gas emissions (GHG) reduction target for the whole transportation sector. This bill also revises and recasts the Alternative and Renewable Fuel and Vehicle Technology Program, administered by the State Energy Resources Conservation and Development Commission, as specified.

ANALYSIS:

Existing federal law:

1) Sets, through the Federal Clean Air Act (FCAA) and its implementing regulations, National Ambient Air Quality Standards (NAAQS) for six criteria pollutants, designates air basins that do not achieve NAAQS as nonattainment, allows only California to set vehicular emissions standards stricter than the federal government, and allows other states to adopt either the federal or California vehicular emissions standards. (42 U.S.C. §7401 et seq.)

Existing law:

- 1) Establishes the Air Resources Board (ARB) as the air pollution control agency in California and requires ARB, among other things, to control emissions from a wide array of mobile sources and implement the FCAA. (HSC §39500 et seq.)
- 2) Designates ARB as the state agency charged with monitoring and regulating statewide greenhouse gas (GHG) emissions, and requires ARB to ensure that GHG emissions are reduced to at least 40 percent below the 1990 level by December 31, 2030. (HSC §38500 et seq.)

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- 3) Requires ARB to prepare and approve a scoping plan to achieve maximum technologically feasible and cost-effective reductions in GHG emissions at least once every five years, and requires all GHG rules and regulations adopted by ARB be consistent with the updated scoping plan. (HSC §§ 38561 and 38592.5)
- 4) Authorizes ARB to include the use of market-based compliance mechanisms (i.e., the cap-and-trade program) until December 31, 2030 to reduce GHG emissions. (HSC §38562)
- 5) Establishes the Alternative and Renewable Fuels and Vehicle Technology Program (Clean Transportation Program, or CTP), to be administered by the California Energy Resources Conservation and Development Commission (CEC), to develop and deploy technologies and alternative and renewable fuels to help attain the state's climate change policies. (HSC § 44272)

This bill:

- 1) Makes findings and declarations.
- 2) Requires ARB and CEC, in coordination with specified state agencies, to jointly develop a comprehensive transportation sustainability strategy. The strategy shall:
 - a) Consider the role of zero-emission vehicles (ZEVs) in reaching emission reductions and sustainability targets, and shall include enhanced public transit, reduction in vehicle miles traveled (VMT), and support for vehicle pooling.
 - b) Identify programs, funding sources and levels, and appropriate regulatory mandates.
 - c) Be equity focused and prioritize investments that will support low-income and disproportionately emissions-overburdened communities.
 - d) Be adopted by the state agencies identified in the strategy.
- 3) Requires ARB, as part of the 2022 update of the scoping plan, to set a GHG emissions reduction target for the whole transportation sector.
- 4) Requires the Governor to identify and appoint one key lead agency to steer the coordination of ZEV deployment across state agencies.

- 5) Revises and recasts the CTP to no longer provide certain project preferences and to additionally provide preference to projects that meet certain criteria:
 - a) Makes the first preference criteria reducing criteria air pollutants and air toxics, with prioritization for projects that reduce these emissions in emissions-overburdened communities and low-income communities.
 - b) Adds preference criteria related to vehicle infrastructure needed to meet the state's climate goals and adds economic benefits located in disadvantaged communities.
 - c) Removes preference criteria related to transitioning from the use of petroleum fuels, decreasing the discharge of water pollutants, not adversely impacting the state's natural resources, reducing GHG emissions by at least 10 percent, and using alternative fuel blends of at least 20 percent.
- 6) Revises the CTP requirement to rank applications based on project preference criteria to additionally include a certain percentage of funding for medium- and heavy-duty vehicles.
- 7) Adds a funding prioritization list for the CTP that includes:
 - a) Medium- and heavy-duty vehicle, including on-road and off-road vehicle, infrastructure, vehicle, research, pilot, demonstration, and deployment projects that reduce emissions from fleets in the goods movement and public transit sectors.
 - b) Infrastructure deployment and related workforce training programs for alternative-fueled vehicles, including utility distribution system upgrades, and grid integration technologies to support those vehicle technologies, specifically including infrastructure deployment for multi-dwelling units.
- 8) Changes the CTP funding eligibility for developing and awarding block grants or incentive programs administered by public entities or not-for-profit technology entities into a funding requirement for the CTP.

Background

1) *Mobile Source Strategy*. On November 24, 2020, ARB released an updated draft Mobile Source Strategy that demonstrates how California can determine the pathways forward for the various mobile sectors that are necessary in order

to achieve California's numerous goals and targets over the next 30 years. The 2020 Strategy intends to maximize the criteria pollutant reductions by going to zero-emission where feasible. Specifically, the 2020 Strategy calls for the deployment of approximately 1.4 million medium- and heavy-duty ZEVs in California by 2045.

- 2) *ZEV Market Development Strategy*. Led by the Governor's Office of Business and Economic Development (GO-Biz), the ZEV Market Development Strategy is an ongoing collaborative effort to accelerate large scale, affordable, and equitable ZEV market development to achieve the state's ZEV goals.
- 3) Climate Change Scoping Plan. AB 32 (Núñez and Pavley, Chapter 488, Statutes of 2006) requires ARB to prepare and approve a scoping plan, to be updated at least once every five years, to achieve the maximum technologically feasible and cost-effective reduction of GHG emissions. SB 32 (Pavley, Chapter 249, Statutes of 2016) updated the AB 32 GHG emissions reduction target to at least 40 percent below the 1990 level by December 31, 2030. AB 398 (E. Garcia, Chapter 135, Statutes of 2017) requires all GHG rules and regulations adopted by ARB to be consistent with ARB's scoping plan that outlines how to achieve maximum technologically feasible and cost-effective reductions in GHG emissions.

ARB's most recent updated climate change scoping plan was released in November 2017. The scoping plan included GHG emissions from numerous sectors including transportation, industrial, electricity generation, commercial and residential, agriculture, high global warming potential GHGs, and recycling and waste. In 2018, total GHG emissions from these sources totaled 425.3 million metric tons of carbon dioxide equivalent, with transportation making up 41 percent of the total.

4) *Cap-and-Trade*. The original cap-and-trade program was recommended by ARB as a central approach to flexibly and iteratively reduce emissions over time. Pursuant to legal authority under AB 32, ARB adopted cap-and-trade regulations on December 13, 2011. AB 398 extended the authority of ARB to implement a cap-and-trade program throughout the state until December 31, 2030.

The cap-and-trade program covers approximately 80 percent of the state's GHG emissions included in the scoping plan. The program covers about 450 entities in the sectors of electricity generation, large industrial facilities, and distributors of transportation, natural gas, and other fuels. The cap is enforced by requiring each covered entity to surrender one "allowance" for every metric

ton of carbon dioxide equivalent that it emits at the end of a compliance period. Some entities need to purchase these allowances through quarterly auctions, while others are allocated these for free. Entities can also "trade" (buy and sell on the open market) the allowances in order to obtain enough to cover their total emissions. Businesses that are covered by the regulation can comply in three ways: (1) reduce emissions, (2) obtain allowances to cover emissions, and/or (3) obtain "offsets" to cover emissions.

Cap-and-trade is designed to limit GHG emissions at the lowest cost by creating a financial market for businesses and households to implement the least costly emission reduction activities. In theory, the market price will adjust to reflect the lowest cost of reducing the last ton needed to ensure emissions remain under the cap.

5) *Air Quality Standards.* Under FCAA, the Environmental Protection Agency (EPA) reviews the NAAQS at five-year intervals to ensure the standards are based on the most recent scientific information. Regions that fail to meet the national standards for any one of the standards are designated "nonattainment areas." FCAA sets deadlines for attainment based on the severity of nonattainment and requires states to develop comprehensive plans, known as the state implementation plan, to attain and maintain air quality standards for each area designated nonattainment for NAAQS. In 2015, EPA lowered the eight-hour ozone NAAQS from 75 parts per billion (ppb) to 70 ppb.

The regions in the San Joaquin Valley Unified Air Pollution Control District and the South Coast Air Quality Management District are designated as nonattainment areas in California for various NAAQS.

6) *Health Impacts of Vehicle Air Pollution*. In addition to regional air pollutant levels, many people experience negative health impacts from high levels of localized vehicle air pollution. Fossil fuel combustion from cars, trucks, buses, and on- and off-road equipment emits criteria air pollutants and their precursors which can cause irritation and damage lung tissue, worsen asthma and chronic illnesses including obstructive pulmonary disease and reduce lung function. Studies have linked short-term ozone exposure with increased risk of death. In addition to contributing to ozone, the biggest impact on health from oxides of nitrogen (NOx) and oxides of sulfur emissions comes when they are converted to fine particulate matter (PM2.5) in the atmosphere. PM2.5 pollution contributes to more fatalities than other air pollutants, and can lodge deep in the lungs or pass through the lungs to enter the blood stream and affect the heart, brain, and other organs. Short-term exposure to PM2.5 pollution is associated with increased hospitalizations and emergency room visits for heart

and lung illnesses, and can lead to premature death. Adverse health effects from long-term exposure to PM2.5 pollution include increased risk of heart attacks and heart disease, impaired lung development in children, the development and exacerbation of asthma, and premature death. Other possible impacts from PM2.5 exposure that are being investigated include low birth weight and impacts to the brain.

Diesel engines emit a complex mixture of air pollutants, including both gaseous and solid material. The solid material in diesel exhaust is known as diesel particulate matter (diesel PM). Diesel PM is typically composed of over 40 known cancer-causing organic substances such as benzene and formaldehyde. In 1998, ARB identified diesel PM as a toxic air contaminant which has been linked to increased cancer risk, respiratory and cardiac illnesses, and premature deaths. ARB estimates that about 70 percent of total known cancer risk related to air toxics in California is attributable to diesel PM. Diesel exhaust also contains gaseous pollutants, including volatile organic compounds and NOx that lead to the formation of PM2.5 and ozone.

7) CTP. AB 118 (Núñez, Chapter 750, Statutes of 2007) originally established the CTP, which was reestablished by AB 8 (Perea, Chapter 401, Statutes of 2013). The statutory direction for the program is to provide funding measures to specified entities to develop and deploy technologies and alternative and renewable fuels in the marketplace, without adopting any one preferred fuel or technology, to help attain the state's climate change policies.

The fees authorized in AB 8 that fund the CTP sunset in 2023. The Governor's fiscal year 2021-22 budget proposal includes extending the sunset for AB 8 fees until 2046 and securitizing CTP revenue to accelerate funding for ZEV infrastructure.

- 8) *Executive Order N-79-20.* On September 23, 2020, Governor Newsom signed Executive Order (EO) N-79-20 which established a goal that 100 percent of California sales of new passenger car and trucks be zero-emission by 2035. In addition, the Governor's order set a goal to transition all drayage trucks to zero-emission by 2035, all off-road equipment to zero-emission where feasible by 2035, and the remainder of medium- and heavy-duty vehicles to zero-emission where feasible by 2045. Under the order, ARB is tasked to work with other state agencies to develop regulations to achieve these goals taking into account technological feasibility and cost effectiveness.
- 9) *Advanced Clean Trucks Regulation*. On June 26, 2020, ARB adopted the Advanced Clean Truck rule, a first-of-its-kind regulation requiring medium-

and heavy-duty truck manufacturers to transition to ZEVs. Beginning in 2024, ARB will require manufacturers' new truck sales in California to be comprised of a certain percentage of ZEVs. For example, 9 percent of the largest classes of trucks in model year 2024 must be zero-emission and that percentage must increase to 75 percent by 2035.

Comments

1) *Purpose of Bill.* According to the author, "California has set ambitious goals to reduce greenhouse gas emissions and local air pollutants that stem from the transportation sector. To achieve these goals, the state must invest in the future of clean transportation, and advance inter-agency coordination to develop clear strategies on how to reach these environmental and climate goals.

"California's Clean Transportation Program (CTP) has been critical to advancing clean charging infrastructure, developing clean technology, and getting clean cars and trucks on the road. However, this program was last updated in 2013, and the market, technology, and goals of the program have all progressed in the intervening decade, leaving the program in grave need of revitalization. SB 726 will reassess the funding priorities of the CTP to prioritize equity and reduce harmful air pollutants that disproportionately affect low-income, disadvantaged, and emissions-burdened communities. Updating and improving the state's CTP means standing up for our communities and defending their right to breathe clean air. With these changes, the state will invest in future generations, and protect the right for disadvantaged communities to live healthy lives. In addition to focusing the CTP on equitydriven goals that reflect the current state of available technology, SB 726 also requires cross-agency planning to align clean transportation strategies with emissions-reduction goals. Targeted investment and comprehensive levelheaded planning for the future of clean transportation is necessary to pave the road toward a brighter, healthier, and thriving future for all Californians."

2) Air Pollution has Disproportionate Impacts. Millions of California residents living in low-income and disadvantaged communities experience disproportionate levels of negative health impacts from air pollution. Research shows large disparities in exposure to pollution between white and non-white populations in California, and between disadvantaged communities and other communities, with Black and Latino populations experiencing significantly greater air pollution impacts than white populations. ARB has found that mobile sources are the largest sources of pollution exposure disparity for Black populations and disadvantaged community residents. Specifically, mobile sources accounted for 45 percent of exposure disparity for the Black population, and 37 percent of exposure disparity for people in disadvantaged communities.

Studies consistently show that mobile source pollution exposure near major roadways contributes to and exacerbates asthma, impairs lung function, and increases cardiovascular mortality. Unfortunately these communities are often low-income and communities of color. Individuals living in communities located near ports and freight hubs are also subject to higher cancer risks than surrounding communities due to their increased exposure to high quantities of diesel PM. Sadly, children living in these communities are also unduly burdened by adverse health impacts. Increased exposure to vehicular traffic pollution has been associated with a number of adverse childhood health impacts, including slower lung development, increased symptoms and medication use in asthmatic children, and even increases in the development of asthma in children.

3) Transportation Sustainability Strategy. Various state agencies produce reports, assessments, and planning documents that could be considered transportation sustainability strategies within their jurisdiction. For example, related to vehicle emissions reductions, ARB's 2020 draft Mobile Source Strategy provides multi-pollutant planning to determine the pathways forward for the various mobile sectors in order to achieve California's air quality and climate goals. The strategy specifically addresses the ZEV targets required to be included in the proposed transportation sustainability strategy in this bill. In addition, ARB reports that the final strategy will include VMT reduction strategies as SB 726 also requires to include when developing the new strategy. Another state transportation strategy is GO-Biz's ZEV Market Development Strategy, which is a cross-agency statewide collaboration that includes both ZEV vehicles and infrastructure.

As this bill moves forward, the author may wish to consider the following questions when further developing and refining ideas for the transportation sustainability strategy:

a) What does transportation sustainability mean and how broad or narrow should a statewide strategy be? Are there any priority areas for the strategy to focus on? Transportation sustainability is a broad term that could have connotations that apply to various types of issues. These may include reducing emissions through ZEV adoption, improving the health and welfare of communities through active transportation, access to affordable and reliable transit, mitigating impacts to wildlife corridors, and work-from-home policies to reduce commuting, among many others.

- b) How do we ensure that existing efforts, such as ARB's Mobile Source Strategy, aren't duplicated when developing a new statewide strategy? Given the existence of numerous transportation strategies already, there may be concern that an overarching strategy would only combine and synthesize these existing efforts.
- c) What are the current gaps in transportation sustainability reporting and *planning*? In addition to a gap analysis, it might also be helpful to identify any concerning interactions or overlap between transportation programs and their strategic planning.
- d) How should disparate issue areas, such as clean vehicle technology and land use, be strategically compared and considered against each other? One helpful area to consider adding to the strategy could be costeffectiveness comparisons across programs and recommendations for funding priorities.
- 4) *Trade-offs to Consider when setting a Transportation Specific GHG Target.* This bill requires ARB to set a transportation specific GHG emissions reduction target in the 2022 scoping plan. In doing so, there may be a couple trade-offs and unintended consequences to consider:
 - a) *Reducing cap-and-trade cost-effectiveness*. GHG emissions themselves do not have a direct public health impact, so the location of the source reduction is not as critical as compared with pollution sources that do have a direct impact. This is why flexible market-based programs such as cap-and-trade are seen as appropriate mechanisms to reduce global climate pollutants. The main attribute of cap-and-trade is cost-effectiveness as the supply and demand of allowances in a cap-and-trade trading market generally determine the price of an allowance. This is the price that provides an incentive to businesses and households that is high enough to encourage enough GHG emission reductions to stay under the cap, but no higher than what is needed.

However, regulatory standards when combined with market-based approaches often will increase the cost of meeting an environmental goal. Specifically, if setting a transportation specific GHG target results in larger and more costly emissions reductions than would have resulted from the cap-and-trade program, that GHG target will reduce the demand for allowances and depress market prices. This could result in not pursuing some lower-cost strategies from other sources because businesses would no longer have an incentive to adopt them. Requiring GHG emissions reductions from a specific source such as transportation could substitute higher-cost for lower-cost reductions that would have occurred as a result of the cap-and-trade program alone.

- b) *Lower priority for local air pollution reductions*. Setting a transportation specific GHG emissions target could inadvertently de-prioritize limited state investments for addressing local air pollution. In general, heavy-duty vehicles have a larger impact on local air pollution, while light-duty vehicles are a larger source of GHG emissions. Setting a transportation specific GHG target could result in shifting limited state investments for heavy-duty vehicles towards light-duty vehicles in order to meet a stringent GHG target. Such a result could be seen as potentially counteracting the intent of other parts in this bill that put a greater focus on the CTP to reduce local air pollution from medium- and heavy-duty vehicles.
- 5) *Revising and Focusing the CTP*. Since the last reestablishment of the CTP in 2013 through AB 8, there have been significant state and federal policy changes. These changes include (1) SB 32 GHG emissions reduction target of at least 40 percent below the 1990 level by 2030, (2) the federal government's more stringent NAAQS for ozone, (3) a new program focused on reducing pollution in heavily-polluted communities (AB 617, C. Garcia, Chapter 136, Statutes of 2017), and (4) a new administrative focus on ZEVs through the recent EO and ARB's Advanced Clean Trucks Regulation. This bill attempts to update and refocus the CTP to better address these more recent policy changes.

First, the bill attempts to update the CTP by removing various project preference criteria. These criteria are likely related to the original focus of the program, alternative fuels, and particularly biofuels at the time. By removing those criteria, this bill is revising the program to likely focus more on ZEV technology. Additionally, the bill moves criteria for reducing local air pollution to first preference and adds prioritization for projects that reduce these emissions in emissions-overburdened communities and low-income communities. The bill also adds preference criteria related to vehicle infrastructure needed to meet the state's climate goals and adds emphasis that economic benefits from projects should be located in disadvantaged communities.

Second, the bill attempts to provide a greater focus on certain types of projects through funding prioritization. The CTP currently lists 13 broadly different project types that are eligible for funding, with no direction for prioritization. This has resulted in the program investing in a wide range of areas since its inception, including infrastructure, fuel production, vehicle demonstration

projects, workforce development, and manufacturing. Recently, the program has been increasingly focused on ZEV infrastructure. SB 726 intends to focus the CTP by prioritizing funding for medium- and heavy-duty vehicles and infrastructure deployment projects.

Some issues to consider when considering these changes are discussed below:

a) *Clarifying funding prioritization*. The first category for priority funding includes "Medium- and heavy-duty vehicle, including on-road and off-road vehicle, infrastructure, vehicle, research, pilot, demonstration, and deployment projects that reduce emissions from fleets in the goods movement and public transit sectors." In order to reduce any uncertainty as to what types of projects this category includes, it might be helpful to rewrite and clarify this statement.

Additionally, there may be some concern with including vehicles in the top priority for the CTP. Traditionally, CEC is the state's lead agency for fuels and fueling infrastructure, while ARB is the state's lead agency for emissions reductions from vehicles. However, SB 726 lists medium- and heavy-duty vehicles as a first priority for funding through the CTP. While there is bound to be some overlap between these two agencies on reducing emissions from vehicles, it might be best to not prioritize vehicles in the CTP in order to avoid overlap, redundancies, and consumer confusion. Moving vehicles from the priority category and instead creating a new eligible category for these vehicle projects that may receive funding will help maintain the CTP's primary focus on fuels and fueling infrastructure.

The Committee may wish to amend the bill to remove vehicles from priority funding and rewrite the first category for priority funding for the CTP as "Medium- and heavy-duty vehicle infrastructure research, pilot, demonstration, and deployment projects that reduce emissions from fleets in the goods movement and public transit sectors for on- and off-road vehicles."

The Committee may wish to also amend the bill to add an eligible project category that may receive funding from the CTP as "Medium- and heavyduty vehicle research, pilot, demonstration, and deployment projects for onand off-road vehicles."

b) *Greater focus on local air pollution*. Given the immediate and detrimental public health impacts local air pollution has on communities of color, there is a strong rationale for providing greater focus on local air pollution reductions and prioritizing funding for medium- and heavy-duty vehicle

infrastructure. There is also a significant funding need to address local air pollution through medium- and heavy-duty vehicles. For example, the administration estimates that more than \$2 billion in additional public funding is needed to deploy heavy-duty vehicle infrastructure at a scale to meet the state's goals.

As stated in the background, the original statutory direction for the CTP is "...to help attain the state's climate change policies." In order to provide consistency and clarify the focus and direction proposed in this bill, it might be beneficial to add local air pollution reduction to the statutory direction for the CTP.

The Committee may wish to amend the bill to include local air pollution as part of the statutory direction for the CTP, which now will read "...to help reduce criteria air pollutants and air toxics and attain the state's climate change policies."

6) *Supporting Early Technology*. Development of new technology occurs across several stages, which can be simplified into five main stages: fundamental research, applied research, prototype development, demonstration, and commercial deployment. SB 726 includes the following for priority CTP funding: "… research, pilot, demonstration, and deployment projects…" Notably, this list does not include early technology support for prototype development.

A prototype translates the results of fundamental and applied research into a product that eventually could be brought into the market. Developing a prototype extends into the entrepreneurial space, and often occurs alongside development of a business to support the product. Funding for the prototype stage of technology development is often seen as a "death valley" between research and commercialization, and therefore is considered a market failure and appropriate for public investment. While early technology investments have longer timelines to see market results, they are widely seen as more cost effective for public investments as they do not crowd out private capital. Although the state currently does not support clean transportation technology prototype development, CEC has a clean energy program (the California Sustainable Energy Entrepreneur Development (CalSEED)) that specifically supports developing clean energy prototypes. Explicitly including prototypes in the lists of technology stages will provide CEC the flexibility to invest in early technology for the medium- and heavy-duty sectors if they see a cost-effective opportunity to do so.

The Committee may wish to amend the bill to include prototypes in the lists of technology stages for CTP funding.

7) *Conflict of Interest?* SB 726 changes one type of project from being listed as eligible for CTP funding, to requiring the program to provide funding for those projects. Specifically, the bill now requires CTP funding for developing and awarding "…block grants or incentive programs administered by public entities or not-for-profit technology entities for multiple projects, education and program promotion within the state, and the development of alternative and renewable fuel and vehicle technology centers."

The sponsor of this bill, CALSTART, happens to be a not-for-profit technology entity, and this change from funding eligibility to a funding requirement could present the appearance of a conflict of interest as CALSTART could directly benefit from this change.

The Committee may wish to amend the bill to remove the requirement for the CTP to fund projects administered by not-for-profit technology entities, and instead move these projects back to the list of eligible projects that may receive funding from the program.

DOUBLE REFERRAL:

If this measure is approved by the Senate Environmental Quality Committee, the do pass motion must include the action to re-refer the bill to the Senate Transportation Committee.

Related/Prior Legislation

AB 1389 (Reyes, 2021) is similar to the parts of this bill that revises and recasts the CTP program. AB 1389 is currently with the Assembly Transportation Committee.

SB 44 (Skinner, Chapter 279, Statutes of 2019), requires ARB to update the 2016 Mobile Source Strategy by January 1, 2021, and every five years thereafter. Specifically, SB 44 requires ARB to include a comprehensive strategy for the deployment of medium and heavy-duty vehicles for the purpose of meeting air quality standards and reducing GHG emissions.

SOURCE: CALSTART

SUPPORT:

Abb INC. Amply Power Anaheim Transportation Network Arrival California Electric Transportation Coalition Calstart INC. Center for Sustainable Energy Change Energy Enow Greenpower Motor Company Mack Trucks Momentum Dynamics Corporation Motiv Power Systems Nikola Corporation Odyne Systems, LLC Pheonix Motorcars Proterra, INC. The Lion Electric Co. Veloce Energy Volvo Group North America

OPPOSITION:

-- END --