



April 22, 2022

NESCAUM  
89 South Street, Suite 602  
Boston, MA, 02111

**Subject: The Lion Electric Co. USA Inc. Comments on NESCAUM’s Draft Multi-State Medium- and Heavy-Duty Zero-Emission Vehicle Action Plan**

Dear NESCAUM staff,

The Lion Electric Co. USA Inc. (Lion) would like to express its excitement about the NESCAUM Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Action Plan. This action plan will accelerate the adoption of zero-emission medium— and heavy-duty vehicles in Connecticut, Vermont, Maine, Massachusetts, New Hampshire, New Jersey, New York, and Rhode Island and ultimately reduce air pollution in the Northeast USA. Lion would like to thank the Northeast States for Coordinated Air Use Management (NESCAUM) for allowing stakeholders to submit their feedback on the draft of the Multi-State Medium- and Heavy-Duty Zero-Emission Vehicle Action Plan.

Lion is the leading Original Equipment Manufacturer (OEM) of purpose-built, all-electric medium— and heavy-duty vehicles, including zero-emission trucks, school buses, and shuttle buses. Lion has successfully deployed these vehicles across the United States. With over 550 commercial electric vehicles on the road throughout North America, we offer an industry-leading 200 miles of range with our all-electric Class 6 truck, 170 miles with our Class 8 trucks, and 155 miles with our all-electric buses. Lion is also proud to have announced our state-of-the-art, automated facility in Joliet, Illinois, that will build up to 20,000 medium— and heavy-duty electric vehicles each year. This new factory of 900,000 square feet will be the largest commercial electric vehicle plant in the U.S., with the first vehicles expected off the production line in H2, 2022.

## Strategies and Recommendations

Please see below for our comments on NESCAUM's propositions for the Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Action Plan:

### Sales and Fleet Purchase Requirements

- **Lion fully supports adopting the Advanced Clean Trucks regulation and California's Heavy-Duty Engine and Vehicle Omnibus regulation.** The spirit and purpose of these strategies align both strongly with Lion's mission as a company solely devoted to zero-emission medium— and heavy-duty vehicle deployment and with NESCAUM members' goal to reduce greenhouse gas and criteria pollutant emissions within their respective states. Our company values safety, reliability, and the health of the communities we serve. We have invested early and deeply to develop zero-emission technology that benefits the communities in which we serve and live. As of matter of fact, we have successfully submitted its first report for ACT credits this year in support of the ACT rule. Lion believes that setting an aggressive schedule for ZEV adoption within member states is a key part of achieving the goals laid out in the Multi-State MHD ZEV Action Plan. Adopting these ambitious policies provides significant financial and environmental gains. They will lead to rapid attainment of the states' emissions reduction goals and lead to cleaner air more swiftly, realized for all the states' residents.
- **Lion supports setting MHD public fleet purchase requirements.** By setting goals to electrify fleets in the public space, NESCAUM members lead by example. Performing rigorous analysis to identify the best opportunities for electrification will result in more than just financial advantages for fleets by reducing their operational and maintenance costs. It will also eliminate criteria pollutant and greenhouse gas emissions while creating a healthier world for our children and drivers. Lion recommends that any purchase and reporting requirements handed down to public fleets should be backed by generous funding. Typically, public agencies do not have the resources to fund their ZEV transition. We recommend that NESCAUM member states provide funding to support most of if not all, the cost of ZEVs for these types of agencies.
- **Lion encourages NESCAUM members to prioritize the electrification of publicly owned or operated school bus fleets** in communities disproportionately affected by air pollution. These communities regularly experience the impacts of air pollution at the cost of their health and quality of life. Residents in these communities often suffer from high rates of asthma and elevated cancer risks, and research suggests that areas with higher long-term levels of air pollution also suffer higher COVID-19 death rates. Children are particularly vulnerable to air pollution due to their lung development. According to the American Lung Association, pediatric asthma is disproportionately high in children living in communities severely affected by air pollution. That is why we recommend that disproportionately affected communities are prioritized in any future school bus funding programs offered by NESCAUM members.

- **Lion firmly believes that NESCAUM members have a unique opportunity** to create cohesive ZEV sales, reporting, and purchase requirements, as well as share knowledge and experiences on creating funding programs and implementation issues between the members. Lion believes that NESCAUM would benefit from including other stakeholders in the development of funding programs, such as fleets, OEMs, Clean Cities Coalitions, etc. Stakeholders have much to offer to NESCAUM in terms of experience working with MHD electrification.

### Vehicle and Infrastructure Purchase Incentives

- **Lion supports the NESCAUM recommendation of creating effective fixed reimbursement vehicles and infrastructure incentive programs**, whether it is an electric school bus program, a clean truck replacement program, and/or other funding programs in the near future. We have seen great success in programs that allow applicants to apply for 75%, 80% - 85%, or 100% of the total project cost instead of just “incremental” costs. The definition of ‘total project cost’ should always include the following: cost of the vehicle (options, add-ons, and all applicable taxes), the charging infrastructure unit, and, if possible, the charging infrastructure installation. Providing this type of assistance (vehicle and charging infrastructure) will be beneficial for both the applicant and NESCAUM member states. This turnkey model will entice more applicants to apply, giving the administrating agency more applications to choose from. More funds will lead to more applications, awards, and vehicle deployments, which will ultimately help drive acquisition costs down and improve air quality, achieving NESCAUM’s goals more swiftly.
- **Lion recommends a voucher-type incentive program.** A leading voucher incentive program that has experienced great success is the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) in California. The following are the voucher amounts offered for the current FY 21-22 program:

Trucks:

- Class 2B \$7,500
- Class 3 \$45,000
- Class 4-5 \$60,000
- Class 6-7 \$85,000
- Class 8 \$120,000

School Buses:

- Type A (with or without a wheelchair lift) \$350,000
- Type C & D without a wheelchair lift \$375,000
- Type C & D with a wheelchair lift \$400,000

- **Lion strongly agrees that incentive programs should benefit communities historically exposed to higher levels of air pollution.** Lion suggests the prioritization of disproportionately impacted communities and disadvantaged business enterprises. These applicants often have fewer resources to supply a cash match and require extra support to start the electrification process. Prioritizing these applicants will ensure a diverse range of applicants and the geographic reach of ZEVs. Moreover, Lion strongly supports the NESCAUM recommendation to simplify the application process to allow OEMs/dealers to

submit application forms on behalf of fleets. We have seen from years of our real-world experience helping fleets with ZEV funding programs that the most effective programs are the ones that allow the OEM/dealer to do most or all of the grant work on behalf of the fleet. HVIP in California has been extremely successful because it lets OEMs/dealers do the work for fleets, reducing the burden on fleets, which is a huge benefit, especially for small and/or disadvantaged fleets.

- **Lion recommends that incentive programs reserve a portion of the funds** to support small fleets, minority-owned businesses, and independent owners and contractors. Funding levels for trucks must be much more generous than existing programs. As an OEM, we have seen that funding just half the cost of a ZEV truck does not incentivize a small fleet, minority-owned fleet, or independent owner or contractor to apply for funding. Funding programs developed under this strategy should benefit these fleets the most. This is because these fleets are in the greatest need of funding and may not be able to transition to zero emissions without support. Prioritizing equity and reflecting the diversity of applicants to ZEV funding programs are fundamental to equitably distribute funds across diverse fleets.

We have seen successful “set-aside” programs in other states where a portion of funding is reserved for applicants in environmental justice areas. Set-asides help fleets operating in disadvantaged areas access funding. In addition, we have also seen successful programs in which fleets operating in environmental justice areas are prioritized in the application process and granted more funding per project. These efforts represent two successful strategies to ensure that fleets operating in disadvantaged areas have increased access to funding for ZEVs.

- **Lion is highly supportive of efforts to establish sales tax exemptions or reductions** for ZEV truck purchases and leases. Oftentimes, sales tax on a zero-emission truck is cost-prohibitive for most fleets, particularly small fleets. Even a small percentage of sales tax on a comparatively more expensive ZEV truck adds up to thousands of dollars.
- **Lion appreciates NESCAUM’s recommendation to identify sustainable and sufficient funding** opportunities to achieve the ZEV goals established in the action plan. In our experience, strong funding programs are the best way to generate interest in fleet electrification and incentivize fleets to transition to zero emission. We encourage NESCAUM members to make funds from any funding programs stackable with one another so that fleets may leverage multiple sources of support, greatly incentivizing ZEV adoption. If fleets can stack funds from programs being developed by their states and fund most or all of their new vehicles, it will hasten ZEV adoption and improve air quality more quickly. Furthermore, we recommend that NESCAUM encourages member states to establish regular and predictable funding programs so that fleets have a steady, reliable source of program funding to facilitate their transition to zero emissions. Predictability in funding helps fleets better plan for ZEV adoption and reduces the cost of ZEVs in the long run by helping OEMs build economies of scale.
- **Lion agrees with NESCAUM’s recommendations to consider scrappage requirements** that maximize fleet participation. Scrappage requirements can be restrictive for some fleets because their trucks or buses do not meet scrappage requirements, or the fleet simply does not have a truck or bus to scrap. However, maximizing fleet participation while considering scrappage requirements would secure

emission reductions by retiring old trucks and buses without penalizing small fleets and independent owners.

Lion, being an electric-only OEM, has seen firsthand how scrapping requirements can reduce fleet participation in funding programs. California is unarguably the leader in MHD ZEV deployment in the U.S. and is often referenced when establishing benchmarks or guidelines for funding programs. Programs such as HVIP that do not have scrapping requirements have seen record demand in recent years, sometimes even being oversubscribed within minutes of opening. Meanwhile, programs that do require scrapping, such as the California Air Resource Board (CARB) statewide Carl Moyer Program, sometimes have a difficult time allocating all funding each year because fleets find it burdensome to meet scrapping requirements. This, of course, only serves to slow ZEV deployment and does not benefit anyone.

- **Lion is supportive of the recommendation of creating funding incentives to support the growth of a secondary market.** Big fleets are well known for keeping their trucks for 3-5 years and then selling them to smaller fleets or independent owners. These trucks can be bought for a reduced price and are still in very good condition. However, until electric MHD vehicle and diesel vehicle cost parity is achieved, developing funding incentives for second-hand trucks would help truck or bus owners that have fewer resources to contribute to air pollution reduction while acquiring a new vehicle.

### [Electric Utility and Utility Regulator Actions](#)

- **Lion supports the NESCAUM recommendation that utility regulators should adopt utility targets** for deploying charging infrastructure that align with state goals. We are pleased to see the inclusion of charging infrastructure in the Action Plan. Charging infrastructure is often a secondary focus of ZEV programs. To be able to successfully reach zero-emission vehicle deployment goals within NESCAUM members states, transportation corridor electrification is key. Electric trucks and school buses need appropriate fast-charging infrastructure between destinations to recharge without an extended delay. Coordinated efforts among NESCAUM member states' utilities are especially important when planning charging infrastructure throughout major transportation corridors. We appreciate the effort to engage utilities in early conversations about fleet charging needs. Engaging utilities in conversations about electrification is crucial to the success of ZEV adoption. We support efforts to create a utility, fleet, and state agency collaboration to establish plans for charging infrastructure. Utilities should be at the forefront of the upcoming charging infrastructure influx and offer flexibility and incentives to commercial clients. Offering a single point of contact for fleets, financing plans, flexible metrics for contract completion, installation of EVSE in advance, and different bill financing and repayment programs for small fleets, transit agencies, etc., are effective tools for utilities to implement to reduce the burden for commercial customers when installing EVSE. In addition, we strongly support the plan to design special EV charging rates. Special charging rates will further increase the affordability of ZEVs and incentivize adoption.
- **Overburdened communities are disproportionately affected by air pollution** and prioritizing air pollution reduction in these communities needs to be reflected in the utilities' investment plans. Lion supports utility regulators in implementing policies and guidelines that support and prioritize investment in overburdened communities.

- **Sharing data collected is key** for continued ZEV adoption. That is why Lion fully supports the NESCAUM recommendation of member states working together with utility regulators, utilities themselves, and other MHD stakeholders to create regional and national forums in which to discuss issues and needs related to MHD ZEVs.
- **Lion encourages NESCAUM members to develop grant and/or voucher programs** to support transportation corridor charging infrastructure, as well as domicile charging infrastructure. With appropriate funding, fleet owners will be able to start their zero-emission transition and increase charging availability at vehicle destinations and in transit. By including the cost of charging infrastructure in the total cost of the vehicle and funding it through a single channel, it simplifies the funding process for fleets and makes ZEV adoption easier and more accessible. Charging infrastructure, including the chargers, installation, and upkeep can be expensive. At times, infrastructure can cost more than the vehicle itself. These additional expenses, if not funded, can discourage fleets from electrification. We hope multiple funding avenues for charging infrastructure can be developed to support fleets in their electrification journey. We encourage NESCAUM member states to allow applicants to stack funds from multiple sources for ZEVs and charging infrastructure to make full use of the funding opportunities available. Furthermore, with funding, an electric corridor can be developed which would incentivize the deployment of light-, medium-, and heavy-duty vehicles throughout NESCAUM member states.

### [Mobilizing Private Capital to Finance Fleet Conversions](#)

- **Lion fully supports NESCAUM's proposal to investigate financing options** for ZEVs and charging infrastructure. We think that the suggestion to establish an innovative financing program similar to the California MHD ZEV Fleet Purchase Assistance Program is a good starting point.
- **Lion is highly supportive of efforts to update and extend tax credits for ZEV truck and bus purchases and leases.** For more information on Lion's support of tax credits, please see our tax credit response on page 4.

### [Outreach and Education](#)

- **Lion fully agrees with the suggestion to develop and implement outreach and education programs.** We are glad to see that NESCAUM prioritizes identifying and disseminating information on the benefits of electrification. Public support is key in mobilizing successful MHD ZEV programs and continuing the shift towards zero-emission technology. With more information on the benefits of MHD ZEV adoption available, we expect more engagement in conversations about electrification and swifter adoption of the NESCAUM member states' goals. NESCAUM and/or its member states should support and create awareness projects to address gaps in MHD ZEV knowledge and experience for businesses. We have seen projects such as webinars, in-person test drive opportunities, vehicle demonstrations, informational portals, technical workshops with stakeholders, etc., be used to disseminate information and raise public understanding about MHD ZEVs.

- **Lion supports the establishment of a “one-stop-shop” website for information regarding MHD ZEVs.** The ability to access relevant policies, programs, and resources that use plain and non-technical language, and translated into other languages, all in one place will reduce confusion surrounding the electrification process and support fleets in their electrification journey. Small fleets often do not have the time or resources to scour the internet for funding opportunities. Putting available funding opportunities in one place will make the electrification process easier for fleets of all sizes and encourage a more diverse range of applicants to funding programs. We imagine that by providing an array of easily accessible resources, fleets will be further encouraged to convert to zero-emission vehicles. A website with a similar concept that we have seen experience success is the California Air Resources Board’s “Truck Stop” website. We encourage the state to draw inspiration from the “Truck Stop” website’s design.
- **It is only through collaboration that we can make large-scale fleet electrification a success** and Lion is supportive of plans to encourage collaboration among NESCAUM member states, ZEV manufacturers, dealerships, EVSE providers, and other partners to provide demonstrations and other learning opportunities, especially for small fleet owners, independent owners or contractors, and minority-owned fleets. We believe that partnering with Clean Cities Coalitions, air quality agencies, non-profits, and other stakeholder groups is key to providing information to a wide and diverse population of fleets and business owners.

### [Economic Equity for Workers](#)

- **Lion supports the NESCAUM recommendation to establish working groups to address economic and labor issues** stemming from MHD electrification, especially in frontline and overburdened communities. We appreciate the planned effort to help workers in disproportionately impacted communities transition to careers in the ZEV industry. This effort will provide workers with strong career opportunities and support the long-term success of the ZEV industry. We believe it is important for NESCAUM member states to engage and discuss with various partners to analyze and compile data to anticipate labor market changes associated with MHD electrification.
- **Lion agrees that NESCAUM member states should provide funding** for the development of education, training, pre-apprenticeships, etc., to equip workers with proper skills to prepare them for careers in the clean transportation industry. NESCAUM member states should partner with employers to sponsor, participate in, and fund apprenticeship and training programs by offering training incentives and tax credits. Technician shortage is a real issue in today’s industry. It is expected that 75,000 additional technicians will be needed in the next three years to meet the demand of the industry. We commend the NESCAUM Action Plan for the proposed initiatives to bolster the future workforce of the ZEV sector, particularly in its efforts to establish training programs. Investing in tomorrow’s workforce today will ensure long-term success for ZEV deployment. We recommend that NESCAUM encourage its member states to provide preference for funding for workforce development programs to entities that train and employ workers domestically and create jobs in the U.S. Lion has taken possession of our facility in Joliet, Illinois, where we will manufacture up to 20,000 battery-electric school buses, shuttle buses, and trucks annually. This facility will create 1,400 jobs in the next 4 years. Lion, as a zero-emission vehicle OEM, is happy to participate in future ZEV education and workforce development opportunities.

- **Lion fully supports the NESCAUM recommendation that member states advocate for more funding** from the U.S. federal government for workforce training and apprenticeship programs. By working together, NESCAUM member states can promote policies, change, and more funding to better the workforce in their respective states.

### [Planning for and Deploying Public Charging and Fueling Infrastructure](#)

- **Lion agrees that NESCAUM member states should establish inter-agency and regional strategic infrastructure planning working groups** that include various stakeholders to begin long-range planning for public infrastructure deployment along highway corridors and in community settings. To be able to successfully reach zero-emission vehicle deployment goals within NESCAUM member states, transportation corridor electrification is key. Coordinated efforts among the states' utilities, municipalities, and charging providers is especially important when planning charging infrastructure throughout major transportation corridors. Lion encourages NESCAUM member states to work with EV OEMs when planning charging infrastructure. EV OEMs have a lot of experience with charging infrastructure given that charging infrastructure is an integral component of an EV's functionality. Lion for example has a charging infrastructure division, LionEnergy, that was created solely to help fleets with their infrastructure through the start-to-finish process. Stakeholders need to work together to implement a fast-charging network that is standardized, interoperable, reliable, and accessible for all.
- **Lion supports the recommendation that the U.S. federal weight limits be increased by 2,000 pounds for zero-emission trucks** to offset the weight of the batteries. Lion, being an electric-only OEM, has had various discussions with fleets of all sizes about weight limits. Payload capacity is a major concern for fleets. All-electric trucks weigh more than standard diesel trucks due to the mass of their battery packs. Increasing the weight limits would offset the loss of payload capacity that commercial operators experience with clean vehicles. As an example, in Canada, the British Columbia government has already taken that step in 2021. British Columbia is the only province or territory in Canada to offer a weight allowance incentive that empowers trucking companies to make investments in clean technology upgrades, knowing with confidence that it will be a sound investment for them. They offer a 1,500 kg (3,307 lb) allowance for electrically powered full-sized commercial vehicles. To further support broad adoption, the government will increase to maximum gross combination vehicle weight, up to 65,000 kg (143,300 lb). NESCAUM could use British Columbia as a model for pursuing this legislative change to facilitate ZEV adoption and lower barriers to electrification for fleets of all sizes.

### [Ongoing Multi-State Research and Policy Evaluation](#)

- **Lion supports the NESCAUM recommendation to partner with research organizations to collect regional and national data.** Research organizations should collect data about MHD ZEV adoption, the barriers to that adoption, charging infrastructure needs, EVSE deployment trends, and the impact of the MHD ZEV transition on small and minority-owned trucking fleets and independent owners/operators. We believe that sharing data collected from funded projects is key for continued ZEV adoption. Lion advises several methods to disseminate data collected from future programs. We highly suggest newsletters, an annual report, and a direct mailer to stakeholders as an effective and succinct way of communicating program data. These methods allow fleet managers

to access program data directly at any given time. In addition to this method, we suggest hosting webinars and/or virtual events where fleets with ZEVs can present the benefits they have experienced with their ZEVs directly to stakeholders. We also suggest sharing data collected from this program with local environmental justice groups and Clean Cities Coalitions to share with their stakeholders. These groups are well connected and may be able to reach stakeholders in new and innovative ways.

- **Lion believes that the NESCAUM member states should identify potential state government actions to support the electrification** of freight movement associated with port operations. Port electrification serves as a long-term solution for operators in the United States to reduce greenhouse gas emissions and reduce their carbon footprint through infrastructure upgrades. High costs associated with the initial implementation of electrification solutions have meant that the maritime industry is now taking a measured approach to adopt these new technologies. For example, the Ports of Los Angeles and Long Beach have committed to a goal of zero emissions generated by good movement by 2030, which is projected to cost approximately \$14 billion. These infrastructure investments in port electrification do not happen overnight. Sometimes they can take decades to complete, but with the support of NESCAUM member states, this transition can be accelerated. Ports are often located close to overburdened communities which bear the brunt of air pollution from port activities. Emission reductions, particularly PM (particulate matter) reductions, are expected to generate substantial public health benefits for the communities surrounding ports. Lion believes that NESCAUM member states should engage with corporate shippers that do not own their fleets and wish to offer zero-emission shipping services to identify existing barriers and opportunities to facilitate third-party zero-emission shipping. Companies that use third-party logistics (3PL) business model do not own the trucks that deliver their goods. If they want to offer zero-emission shipping to their customers, they need to work with a 3PL that already owns zero-emission trucks. With the rise of e-commerce, delivery trucks drive even more miles through our neighborhoods around the country and the world. With concrete state government actions, NESCAUM member states can help accelerate the shift to zero-emission delivery. Furthermore, to address emissions associated with freight movement, states should explore the adoption of indirect source rules for warehouses and other trucking distribution facilities and local planning guides for new facilities.
- **Lion supports the NESCAUM recommendation to work with research partners and OEMs** to analyze the relative costs and benefits of different approaches to battery reuse, remanufacturing, recycling, and disposal. As an electric-only OEM, Lion can offer insight on battery disposal and reuse. Lion is currently working with its customers and electric utility providers on possible secondary battery use, such as storage for solar power, emergency response, and backup generators for communications and site operations during power outages. We are also testing additional applications, such as using our electric truck batteries to power cell phone towers, medical sites, etc. Finally, when a battery can no longer be used because its entire energy retention has been exhausted, we can still recycle the individual battery pack components and materials to reduce waste. There are several methods to effectively recycle the distinct elements of every battery. For example, Lion's battery packs are made of steel, copper wire, and metals (lithium, cobalt, magnesium, and nickel), which can all be reused and recycled. At Lion, we take sustainability very seriously as a company and do our part to minimize our waste generation, reuse materials, and promote environmentally friendly practices.

### Local Government Role

- **Lion agrees that local governments need to play a bigger and more active role** in MHD ZEV deployment. We believe that local governments should set ambitious near- and long-term target plans for electrifying municipal and transit fleets and proactively plan for EVSE needs in their transportation, climate, or energy plans. Local governments are responsible for building codes, land use regulations, and engineering compliance, and should amend existing policies to plan for EVSE needs in concert with utilities and charging providers along commercial truck routes, depots, etc.
- **Lion agrees with NESCAUM's assertion that member states' local governments should incentivize electric truck and bus adoption** through non-monetary approaches, such as the activities mentioned specifically by NESCAUM, but also through monetary instruments. Local funding is extremely important in the ZEV arena because stacking multiple funding programs is a critical method which many fleets leverage to fund their ZEV deployment. Local funding programs tend to be the most flexible when it comes to stacking and it helps stretch public dollars further. It also allows more ZEVs to be deployed for the same amount of investment.

### U.S. Federal Government Role

- **Lion agrees that the U.S. Environmental Protection Agency (EPA)** should increasingly adopt more stringent GHG and criteria pollutant emission standards for MHD vehicles. Many states are already adopting ambitious near-term goals such as the Advanced Clean Trucks and Low NOx Omnibus rules or Innovative Clean Transit Regulation that will significantly reduce greenhouse gas emissions and improve air quality. Meanwhile, other states are not taking any actions to reduce GHG emissions. Having a national emission standard that evolves with clean technologies will help the U.S. as a whole reduce its GHG emissions more swiftly. That is why Lion believes that the EPA needs to continuously adopt more stringent GHG and criteria pollutant emission standards.
- **Lion suggests that NESCAUM encourage member states to organize for federal manufacturing tax credits for OEMs that only manufacture ZEVs** because their operations only produce vehicles that are clean and do not harm the environment, unlike many other legacy OEMs who, despite beginning their transition to zero emissions, are still producing combustion vehicles that are harmful to our environment and communities.
- **Lion agrees that U.S. Federal agencies should reserve a portion of federal infrastructure funding for high-capacity chargers to serve heavy-duty trucks.** To be able to successfully reach zero-emission vehicle deployment goals in the U.S., transportation corridor electrification is key. Trucks need appropriate fast-charging infrastructure between destinations to recharge without an extended delay. Charging downtime is one of the biggest concerns of commercial truck fleets considering transitioning to zero emissions. As more heavy-duty charging stations are deployed across the U.S., greater numbers of truck fleets will be encouraged to adopt ZEVs knowing that their business operations will not be hampered by long charge times or lack of charging stations along trade routes.

## Conclusion

To close, we strongly support NESCAUM's decision to seek feedback on the Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Action Plan. We look forward to the benefits that this plan will bring throughout Connecticut, Vermont, Maine, Massachusetts, New Hampshire, New Jersey, New York, and Rhode Island. Should NESCAUM be interested in speaking with our team, we are more than happy to schedule a virtual meeting.

Lion would like to thank you for taking the time to read our comments. We look forward to continuing to work with you to promote clean air for communities throughout the U.S.

Sincerely,



**Bianca Heroiu**  
**Director of Grants and RFPs**