



(888) 633-8380 | MODEL1.COM

MODEL 1 COMMERCIAL VEHICLES

9225 Priority Way W. Dr.
Suite 300
Indianapolis, IN 46240

To Whom It May Concern,

On behalf of Model 1 Commercial Vehicles, Inc. (hereinafter "Model 1"), thank you for reviewing our response to your Request for Information (RFI) on the Used Truck Voucher Pilot Concept.

Model 1 is the blueprint for creative commercial vehicle solutions, setting the example the industry follows with a drive for continual improvement and innovation. We offer a wide range of vehicles in both the retail and public sectors including school buses, transit buses, vans, and trucks.

As a company, we have extensive experience participating in state incentive programs, including HVIP and its various subsets, and are excited to learn that the California Air Resource Board (CARB) intends to offer funding for used vehicles in the near future.

If you have any questions about our response, please do not hesitate to contact me at 909-838-7426 or ebaker@model1.com.

Thank you,

Erica Baker

Erica Baker
Grants Manager
Model 1 Commercial Vehicles, Inc.
2/28/2025

*Setting the example
the industry follows*

REQUEST FOR INFORMATION



Used Truck Voucher Pilot Concept

1. Which specific entities or industry experts should be involved in the design of the Used Truck Voucher Pilot Concept?

Dealers, manufacturers, and fleets, including public sector and school bus fleets, should be involved in the design of the Used Truck Voucher Pilot Concept. If the market for electric vehicles is tenuous, the market for *used* electric vehicles is virtually nonexistent. The program should be developed with this fact in mind. We would urge CARB to broaden the scope of eligibility and solicit as much participation in the initial pilot as possible.

2. Would a voucher process through an HVIP approved dealer work for this pilot concept?

Yes, the dealer-led application process would work well for used vehicles to alleviate the administrative burden on prospective purchasers.

3. Should the Used Truck Voucher Pilot Concept have a fleet size and revenue cap? If so, please provide input.

No. Fleet size and revenue caps would only further shrink the already-small market for used electric vehicles. If funding amounts are high enough, the program will organically attract many small fleets without the imposition of these caps.

The market for electric vehicles, both new and used, is receding amongst larger fleets, especially given the recent withdrawal of the Advanced Clean Fleets enforcement waiver, the increased tariffs and resulting MSRP increases, and the scarcity of incentive funding. As such, CARB should aim to continue incentivizing ZEV adoption by large fleets and should not limit large fleets' access to new or used ZEVs.

4. What should the incentive level be?

Because used electric vehicles are particularly challenging to sell, incentive levels should be at least ten percent higher than the current Innovative Small e-Fleet (ISEF) incentive levels. While new electric vehicles are already viewed with skepticism and generally considered less dependable than ICE alternatives, fleets tend to view used EVs with even greater skepticism and will require increased incentivization.

a. Should incentives vary based on mileage, vehicle body type, and/or battery capacity?

Increased funding for vehicles with less than 10,000 miles may be required to offset their cost.

In order to encourage a simple and seamless process, we do not recommend complicating the incentive calculations based on body type or battery capacity.

5. What type of certification should a used vehicle have to ensure quality?

REQUEST FOR INFORMATION



Used Truck Voucher Pilot Concept

a. Original Equipment Manufacturer Certified?

We are unsure of what is meant by this, but given the widespread collapse of ZEV manufacturing, we do believe CARB should require that ZEV manufacturers are still in business and capable of supporting warranty repairs.

b. Battery state of health?

Rather than monitoring for battery state of health, we would suggest requiring that the used ZEV's battery be under warranty. We would also suggest that CARB offer a grant program for battery replacements in used ZEVs post-warranty to supplement the Used Truck Voucher Pilot Concept.

c. Others?

N/A

6. Should eligible vehicles be capped at a specific mileage or age?

Our general recommendation would be that vehicles older than 10 years or with more than 100,000 miles should not be included. As mentioned in our response to question 4.a., funding amounts should be highest for vehicles with under 10,000 miles to offset their cost, but vehicles with odometer readings between 10,000 and 100,000 miles may still be viable and should be considered eligible.

7. What sort of recordkeeping or reporting requirements would be appropriate for fleets awarded a voucher?

While we are always in favor of decreasing administrative burdens for fleets, administrative simplicity will be of particular importance for the Used Truck Voucher Pilot Concept since there are already increased barriers to adopting used EVs. To that end, we believe the fleets should be required to provide copies of current registrations throughout the contract term, and nothing more. If CARB requires additional data collection, OEMs may be required to provide telematics reports.

8. Is there value in funding/requiring extended warranties? What would be an effective strategy?

There would be tremendous value in funding extended warranties as this would ease many of the general concerns surrounding used ZEVs. As previously stated, we believe CARB should require that the battery of each used ZEV is under warranty. An extended warranty should only be required if the standard warranty period has ended at the time of application.

9. Would there be reasons why you would avoid purchasing a used zero-emission vehicle? If so, please elaborate.

REQUEST FOR INFORMATION



Used Truck Voucher Pilot Concept

Given the recent and ongoing upheaval in the EV market, many manufacturers are no longer equipped to provide the level of support needed to keep used EVs on the road. Cost would also be a critical concern. We urge CARB to consider the immediate need for increased funding when developing this program as well as other programs or subsets of HVIP.

10. Are there additional strategies, comments, or feedback that you would like CARB staff to consider as they explore the design of a Used Truck Voucher Pilot Concept?

In addition to the suggestions above, please consider including passenger transportation vehicles such as school buses in the Used Truck Voucher Pilot Concept. All sectors are currently struggling with ZEV adoption, so widespread access to used ZEV incentives could make a significant impact in furthering the state's clean transportation goals.