

---

**From:** Kevin Vincent  
**Sent:** Sunday, October 7, 2018 4:15 PM  
**To:** VWSettle  
**Subject:** Draft Beneficiary Mitigation Plan for Texas

Workhorse Group Inc. (Workhorse), is a U.S. small business that manufactures electric trucks and vans, including Class 4 through 6 delivery trucks and vans.

Mitigation projects to replace diesel vehicles with electric vehicles are an excellent use of VW Settlement Beneficiary Mitigation Plan funding. Replacing class 4 through 6 diesel delivery vehicles with electric vehicles is the most effective use of Beneficiary Mitigation Plan funds. The drive cycle for delivery vehicles is ideal for electric drive. They make frequent stops usually within a limited range and typically return to a home base each night where they can be charged at less expensive overnight rates. Of course, replacing diesel delivery vehicles with all-electric vehicles will achieve 100% NOx reduction.

Diesel delivery vehicles usually operate in areas with a disproportionate pollution burden. Distribution centers are in locations that now receive a disproportionate share of air pollution burden from diesel fleets. As a result, funding for electric delivery vehicle purchases would be the quickest and most effective way to mitigate the damage to human health and the environment from diesel emissions.

Class 4 through 6 electric delivery vehicles can be acquired now. Workhorse is currently producing all-electric delivery trucks and its new all-electric N-GEN delivery vehicle goes into production later this year. Furthermore, many other manufacturers have announced that they are introducing class 4 through 6 electric trucks within the next few years. By using its Beneficiary Mitigation Plan funds for class 4 through 6 delivery trucks, the citizens of Texas can obtain benefits from this funding in the near term, rather than far into the future or never at all.

We applaud the State of Texas for proposing to use its Beneficiary Mitigation Plan funding to support the replacement of diesel trucks with electric trucks. We fully support the allocation of funds that can be used for the acquisition of Class 4 through 8 electric trucks in the draft Indiana Beneficiary Mitigation Plan.

Workhorse is interested in working with companies and government agencies that propose to use Mitigation Plan funding to replace their diesel fleets with electric vehicles.

Thank you for giving us an opportunity to comment on the Texas draft Beneficiary Mitigation Plan. Please contact me if you have any questions about our comments

Sincerely,

**O. Kevin Vincent**

**Vice President for Government,  
Regulatory & Safety Affairs  
Workhorse Group Inc.  
703.822.3390 Mobile  
[www.workhorse.com](http://www.workhorse.com)**