

Timothy French, Truck and Engine Manufacturers Association

Public Hearing Testimony, July 27th, 2021

Hi, good afternoon. My name is Tim French and I'm speaking on behalf of the Truck and Engine Manufacturers Association. **[unintelligible 00:02:29]** the world duty and heavy-duty trucks and truck engines. The types of commercial vehicles covered under the DOE's proposal to opt into California's advanced clean trucks rule. EMA actively participated in the California ACT rule-making process, and we appreciate the opportunity to present comments today.

EMA and its members fully support the commercial trucking fleet **[unintelligible 00:02:52]** and agree that 2045 is a reasonable target date for the broad deployment of ZEV trucks wherever feasible. EMA members are spending billions of dollars toward that end and already are producing ZEVs for some applications. However, to bring about our shared visions for the future, a comprehensive and coordinated state and federal strategy is required to develop and implement the widespread deployment of ZEV trucks.

A critical first step in that deployment is the need to invest in and develop the infrastructure necessary to recharge or refuel ZEV. Washington can and must be a leader in those broad-based efforts, which for trucks, will involve longer planning and installation timelines and significantly larger public investments than for passenger cars. In addition, we all know that the cost of a ZEV truck is two to three times higher than for a conventionally fueled truck. **[unintelligible 00:03:52]** operator by the higher price ZEV products that EMA's members would be obligated to sell.

As a result, and as another critical first step, Washington should also provide sustained incentive funding to offset that significantly higher price differential. In addition, Washington should set an example by requiring the purchase of ZEVs and near ZEV trucks for any portion of any state-funded commercial vehicle purchases going forward. Given the size and nature of the challenges that relate to a comprehensive infrastructure build-out and an incentivized ZEV deployment initiative, federal leadership and action is needed.

The Biden administration is poised to provide that leadership. We anticipate that U.S. EPA will be proposing new advanced emission requirements for heavy-duty and medium-duty trucks before the end of the year. Those requirements will include reduce NOx standards and lower greenhouse gas standards based on the growing deployment of ZEVs. Washington should be a leader and advocate **[inaudible 00:04:59]** those federal probe without **[inaudible 00:05:03]** impacts on Washington's economy and environment could be significant.

In light of what we can anticipate from the Biden administration before the end of the year, the DOE's proposal should be deferred until such time as all stakeholders can evaluate the steps that the federal government will be taking to build toward us that based future for the commercial trucking industry. Then the DOE along with other

relevant state agencies and stakeholders can supplement those federal efforts as necessary in a truly coordinated manner to leverage and accelerate ZEV truck deployments as appropriate in Washington and elsewhere.

Not waiting to see what the federal government will do could short circuit [inaudible 00:05:56] not have been, importantly, deferring this action for a year would not jeopardize the proposed implementation of the ACT rule in 2025. Since for this rule as defined [inaudible 00:06:12] model year and [inaudible 00:06:18] year are the same. Again, under the ACT rule, model year and [inaudible 00:06:25].

Consequently, if the DOE waits to take action on this rule until 2022, the required two years of lead time under the federal Clean Air Act, section 177, will still be available before implementing the rule in 2025. There is no question about that. Deferral also makes sense to allow the DOE to assess all of CARBS regulations that Washington will be opting into. More specifically, we know that CARB will be significantly revising the ACT rule next year.

CARBS Omnibus low NOx rule is not yet final and CARBS Advanced Clean Fleets rule is being delayed until the end of 2022. Given that Washington has another full year to act on the ACT rule [inaudible 00:07:11] and implementing [unintelligible 00:07:14], it seems clear that Washington should wait for California to finalize all of the [inaudible 00:07:20] plus medium [unintelligible 00:07:25] standing the cost, benefits and consequences of adopting all three of the relevant CARB rules, the DOE cannot properly [inaudible 00:07:34] impacts [unintelligible 00:07:36].

There are multiple other reasons why the proposed ACT rule should not be adopted. We have explained those in our preliminary written comments and I'll include a full set of comments before the close and the rulemaking record. Thank you for the opportunity to speak on this matter, and I would be happy to answer any questions you might have.

Melanie Forster, Ecology Hearings Officer

Thank you, Timothy. Unfortunately, I was not able to hear all of your testimony. There seem to be some technical issues and you were cutting out. If you wouldn't mind submitting your comment in writing as well before the end of the comment period, that would be great. We really would not want to miss any of your testimony. We'd like to be able to consider everything you've said. Again, my apologies for the inconvenience, but if you could submit that in writing, that would be great.