Emily Duff, CERES

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Great. Hi, Emily Duff from Ceres. I'm a manager for state policy and I'm here today to comment in support of the Zero-Emission Vehicle Program and the Advanced Clean Truck or ACT rule. My comments today will focus on the ACT rule. Ceres coordinates multiple networks of influential investors, fortune 500 companies, and consumer-facing brands that are embracing a sustainable future.

This includes our BICEP Network, which is a coalition of more than 70 major businesses, many of whom have substantial operations or are headquartered in Washington, as well as the Corporate Electric Vehicle Alliance, which is a collaboration of 26 companies, including Amazon, DHL, Ikea and others looking to decarbonize and electrify their fleets. The companies and institutions we work with, see moving to a zero-emission transportation future not only as the climate and clean air imperative but also as the economic opportunity, generating cost savings and creating jobs.

In fact, and let me stress this point, there are already positive total cost of ownership in several classes of medium and heavy-duty vehicles. We expect to see net cost savings in all classes in the future. However, despite our members' investments and goals, the reality is that the private sector can not do this on its own to transform the market at the pace needed to meet climate goals and to do so at a scale that unlocks market efficiencies. For this, we need supporting policy.

The adoption of market-enabling policies like ACT will more rapidly unlock the long-term savings as well as the climate and clean air benefits of zero-emission trucks. ACT is also essential to send the necessary market signals that will catalyze the deployment of charging infrastructure and build demand for other supportive policies, which will create a more stable and self-sustaining ecosystem for electric trucks. Ceres strongly supports the adoption of the ACT rule and applauds Washington for taking the steps. We look forward to working with you to continue the ambition and reducing transportation emissions. Thank you.