Good Afternoon Board Members and other officials,

My name is Cara Lynch and I’m an attorney who works on clean energy law and policy in our beautiful state of New Mexico. My comments address the issues of: emissions, cost, and the direction the industry is headed. The articles I cite for this information include one from MIT[[1]](#footnote-1), another from Mckinsey and Company[[2]](#footnote-2), and Consumer Reports and Forbes.

First, I’d like to address the issue of emissions. It is true that producing a new EV may emit 80% more emissions than building a comparable gas-powered car.[[3]](#footnote-3) It is also true that charging may emit CO2 as well, though that depends on if the energy used to charge a vehicle is renewable or not and whether the creation of that energy emit CO2. What matters most however, is lifecycle emissions. For example, the Department of Energy shows that a typical gas-powered car emits 11,435 lbs. of CO2 per year, hybrids and plug-in hybrids emit about 6,000 lbs of CO2 per year, whereas an EV emits 3,932 lbs. per year. EVs may not be pristine but they are about 3.5X cleaner than gas powered cars. That means they are an important tool to reduce CO2 emissions.

Secondly, EVs are affordable now. Many people think of EVs as the expensive option, but EVs are the same price of a used vehicle. For example, a new “affordable” EV runs from about $27,000 to $54,000. Those figures are not out of the ordinary compared to the price of a new gas-powered car. In fact, the industry is working quickly to create even more affordable options. Tesla, for example, is opening a manufacturing plant in Berlin to produce a new EV that costs $27,000.[[4]](#footnote-4) Figure in the federal and any state rebates and the price drops into the mid teens.

Lastly, the EV industry is evolving, to reduce carbon emissions in upstream mining and production, thereby reducing overall lifecycle emissions for EVs. For example, more than 100 auto industry original equipment manufacturer (“OEM”) and their suppliers have committed to reduction emissions and part of the Science Based Targets Initiative. In addition, regulatory shifts, such as battery component requirements and manufacturing standards in the found in the Inflation Reduction Act (IRA), continue to push the supply chain to reduce embedded emissions.[[5]](#footnote-5)

For all these reasons and many more, New Mexicans deserve promulgation of the Advanced Clean Cars and Trucks rules.

Thank you.

1. <https://climate.mit.edu/ask-mit/are-electric-vehicles-definitely-better-climate-gas-powered-cars> (“MIT Climate Portal) [↑](#footnote-ref-1)
2. https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/the-race-to-decarbonize-electric-vehicle-batteries [↑](#footnote-ref-2)
3. MIT Climate Portal. [↑](#footnote-ref-3)
4. https://www.forbes.com/sites/siladityaray/2023/11/06/tesla-is-reportedly-planning-to-build-a-sub-27000-car-at-its-berlin-factory/?sh=420d59023cf4 [↑](#footnote-ref-4)
5. https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/the-race-to-decarbonize-electric-vehicle-batteries [↑](#footnote-ref-5)