



Corporate Electric Vehicle Alliance

Office of Governor Michelle Lujan Grisham  
490 Old Santa Fe Trail Room 400  
Santa Fe, NM 87501

August 24, 2023

**Re: Major Commercial Fleet Operator Support for Advanced Clean Cars II and Advanced Clean Trucks Rule Adoption**

Dear Governor Lujan Grisham,

I write on behalf of the [Corporate Electric Vehicle Alliance](#) (the Alliance) – a coalition of 31 major companies and fleet operators that represent over \$1.2 trillion in annual revenue and collectively own, lease, or operate more than 2.7 million fleet or networked vehicles in the U.S. – to express our support for state adoption of the Advanced Clean Trucks (ACT) and Advanced Clean Cars II (ACC II) regulations.

Alliance members share a common goal to electrify their on-road fleet and networked vehicles to capture operational cost savings, meet climate goals, and support the community health of their customers and employees. In alignment with this goal, the Alliance currently represents robust demand for zero emission vehicles (ZEVs), with members planning to procure approximately [330,000](#) ZEVs, under a supportive market environment, as soon as 2026.

While the availability of commercial ZEVs in the U.S. market has improved, major fleet operators still face difficulties in procuring the ZEVs needed—in terms of both unit volume and model configuration—to meet their ambitious climate and sustainability goals in a timely manner.

**As major operators of light-, medium-, and heavy-duty vehicles, Alliance members rely in large part on technology-driving policies like ACC II and ACT to close the gap between supply and demand for zero-emission commercial vehicles.**

**Corporate Support for ACC II and ACT**

Market-enabling policies like ACT and ACC II will rapidly unlock the long-term savings, climate, and clean air benefits of fleet electrification, while spurring the much-needed widespread build-out of charging infrastructure to meet increased ZEV deployment. The more states that adopt ACT and ACC II, the greater the benefits of the rules, effectively lowering costs and creating a more stable, coordinated, and self-sustaining market for ZEVs.

**By adopting policies like ACT and ACC II, state policymakers can help fleets access the volume and variety of ZEV models they need to unlock significant economic, health, and climate benefits.**

**Additional state adoption of ACCII and ACT also enables major companies, including those in the Alliance, to plan more effectively for regional and nationwide rollouts of clean vehicles.**

**ACC II**

Alliance members represent over 830,000 light-duty vehicles (LDVs) in operation across the U.S. and are looking to procure nearly 270,000 zero-emission sedans, SUVs, and pickup trucks by 2026. As major consumers and operators of LDVs across the U.S., Alliance members strongly support and encourage state adoption of clear regulatory guideposts that enable the auto and trucking industry to reliably plan

for the future. Additionally, by establishing clear regulatory standards and deadlines, companies are able to make better informed fleet procurement plans, which in turn create a predictable and supportive business environment that encourages investment and spurs job growth.

**An ambitious ACC II program that drives additional automaker investment and produces greater model availability throughout the U.S. is both necessary and feasible.** States that have adopted ACC (ACCII's predecessor) represent a third of U.S. car sales, and this has had a significant impact on the market, sending clear signals to fleets considering electrification and providing regulatory certainty to manufacturers. As more states adopt ACC II, the benefits to the market will only expand, which will lead to further reduced costs and increased availability of clean cars.

As businesses, Alliance members are making significant commitments to reduce GHG emissions and protect the health and economic well-being of the communities in which they live and operate. However, these commitments alone will not be enough to meet shared climate goals. With no equivalent federal policy expected, expeditious and ambitious state action is imperative.

**Accordingly, the Alliance supports state adoption of the ACC II rule to ensure increased availability of ZEVs year-over-year until 100% of new light-duty vehicles sold are zero-emission in 2035.**

## ACT

Furthermore, Alliance members represent over 300,000 class 3-8 medium- and heavy-duty vehicles (MHDV) in operation across the U.S. and plan to procure more than 60,000 zero-emission MHDVs by 2026. While several manufacturers have made commitments to reach 50-67% medium- and heavy-duty ZEV sales by 2030 and 100% by 2040 or sooner, major fleet operators still face difficulties in procuring zero emission MHDVs at the volumes and price points, and with the specifications (e.g., electric range, payload, towing capacity, etc.) they require to meet their operational needs and ambitious sustainability goals.

The ACT rule will both increase the availability of critical zero-emission MHDV models and help lower their upfront cost. Currently, the upfront purchase price for a zero-emission MHDV is approximately two to three times higher than the upfront purchase price for a comparable diesel model.<sup>1</sup> By requiring manufacturers to increase ZEV sales and by driving additional manufacturer investment in clean vehicles, additional state adoption of ACT will accelerate the economies of scale that drive down costs and enable cost-effective electrification of commercial vehicles. Increased access to affordable zero-emission commercial vehicles across states and regions will allow Alliance members to remain competitive in a market where customers, investors, and employees increasingly expect companies to lead on sustainability.

**Accordingly, the Alliance supports state adoption of the ACT rule to ensure increased availability of zero emission trucks year-over-year until 2035 when zero-emission models comprise 55% of new MHDV sales for Class 2b – 3 trucks, 75% for Class 4 – 8 trucks, and 40% for truck tractors.**

## ZEV Model Suitability

In addition to adopting the ACT and ACC II rules to increase the volume of ZEV production and improve manufacturer release timing transparency, **it is crucial that state policymakers support action to ensure**

<sup>1</sup><https://californiahvip.org/tco/>

**vehicle manufacturers offer a wide variety of ZEV model options from class 1 to class 8 vehicles capable of meeting the needs of diverse fleets and use cases.**

To support production of diverse EV models, the Alliance also encourages state policymakers to consider providing a forum for businesses and vehicle manufacturers to engage in critical conversations on key issues (e.g., ZEV configurations, model release timing, technology management, and financing).

Adopting ACT and ACC II to accelerate the electrification of commercial transportation will support a cleaner, more energy-efficient economy through local innovation and investment in clean technology manufacturing. In addition, ACT and ACCII will help create new jobs, cut costs for our value chains, mitigate climate risk, and reduce health care costs by improving public health.

Thank you for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara Forni", is enclosed within a thin black rectangular border.

Sara Forni  
Director of Clean Vehicles, Ceres

On behalf of the [Corporate Electric Vehicle Alliance](#) (CEVA), led by Ceres