



Corporate Electric Vehicle Alliance

The Honorable Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Mail Code 1101A
Washington, D.C. 20460

Re: Proposed Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles - Phase 3; EPA-HQ-OAR-2022-0985; FRL-8952-01-OAR.

Dear Administrator Regan:

I write on behalf of the [Corporate Electric Vehicle Alliance](#) (the Alliance), led by Ceres—a coalition of 32 major companies and fleet operators that represent over \$1.1 trillion in annual revenue and collectively own, lease, or operate more than 2.5 million fleet or networked vehicles in the U.S.—to emphasize members' continued support for the Environmental Protection Agency's (EPA's) adoption of stringent greenhouse gas (GHG) emissions "Phase 3" standards for heavy-duty vehicles (HDVs).

In June 2023, the Alliance submitted [comments](#) to EPA in response to its notice of proposed rulemaking on the Phase 3 HDV standards. In these comments, we expressed support for standards that are at least as strong as those proposed, but ideally are stronger to ensure at least 50% zero-emission vehicle (ZEV) sales across all market segments by 2032. California's Advanced Clean Trucks (ACT) rule, manufacturer commitments, and the Inflation Reduction Act (IRA) funding are all consistent with such a goal.

At this critical time ahead of the standards being finalized, the Alliance is further weighing in to emphasize our support for strong ACT-alignment, and the technical and economic feasibility of widespread commercial fleet electrification that would result from strong standards. Commercial fleets need policy and regulatory support to access the full volume and variety of ZEV models and charging infrastructure solutions to meet their decarbonization goals.

Outlined below is the Alliance's case for why:

- 1) there is corporate support for ACT-aligned Phase 3 standards,**
- 2) heavy-duty ZEV technology is feasible for widespread adoption in HDV fleets, and**
- 3) the U.S. electrical grid, utilities, and fleets can (with support from policymakers and private sector investment) manage the infrastructure installations and upgrades required of widespread heavy-duty ZEV adoption.**

1) Corporate Support for ACT-Aligned Phase 3 Standards

Market-enabling policies like EPA's proposed Phase 3 GHG emissions standards for HDVs will rapidly unlock the long-term cost savings, climate, clean air, and economic benefits of widespread ZEV adoption, while spurring the much needed at-scale build out of charging infrastructure to meet increased electric vehicle (EV) demand. The more closely aligned that EPA's HDV standards are with the



Corporate Electric Vehicle Alliance

ZEV sales targets of California's ACT rule, the greater the benefits of the standards, effectively lowering costs and creating a more stable, coordinated, and self-sustaining market for ZEVs nationwide.

2) ZEV Technology is Feasible for HDV Fleets

Many major companies, including multiple Alliance members, have [committed to electrifying between 50% and 100%](#) of their medium- and heavy-duty fleet operations by 2030, indicating that commercial fleets see ZEVs as operationally and financially viable options, including in heavy-duty use cases.

The [results](#) of real-world zero-emission truck deployment studies have proven their feasibility for major commercial fleets. Financially, [according to the International Council on Clean Transportation \(ICCT\)](#), even heavy-duty long-haul ZEV applications will have a total-cost-of-ownership (TCO) advantage over internal combustion engine (ICE) vehicles by 2030. And operationally, not only are original equipment manufacturers (OEMs) and suppliers bringing [innovative technologies](#) to market that make ZEVs an option across more and more use cases and class sizes, but vehicle operators themselves are speaking out on the [preferred driveability](#) of ZEV trucks over their ICE counterparts.

Currently available ZEV trucks are overcoming one of the most often mentioned barriers to heavy-duty electrification: range. According to the National Renewable Energy Laboratory (NREL), only about [10% of heavy-duty trucks](#) have operating routes of 500 miles or more, whereas around 70% operate primarily within 100 miles, well within the range of currently available heavy-duty EVs.

The predictable routes of most heavy-duty fleet use cases add to their electrification readiness. [As the Union of Concerned Scientists \(UCS\) notes](#), "heavy-duty vehicles often travel to predictable destinations with consistent mileage, making them good candidates for electrification." Such predictability also makes it easier to schedule time to charge, and can lead to [overnight charging](#) taking up less overall time than fueling up a diesel truck.

3) The Grid, Utilities, and Fleets Can Handle HDV Charging Infrastructure Growth (with Support from Policymakers and Private Sector Investment)

Contrary to fears about EV deployment overwhelming the electricity grid, studies have found that it is highly likely the U.S. grid will be able to accommodate the relatively modest growth in national electricity generation (around [1% by 2030 from a 2021 baseline](#)) that is projected from zero-emission medium- and heavy-duty vehicle (MHDV) demand in 2030. Historically, the U.S. grid has managed to accommodate much more [severe strains on its capacity](#) than the strain the EV transition will impose.

We acknowledge that challenges—such as long lead times—may arise as fleets work with their local utilities to install charging infrastructure to serve heavy-duty EVs, especially when they require site and broader grid upgrades. However, while complex, many of these hurdles can be mitigated and even solved by collaboration, strategic communication, and advanced planning—and fleets are not alone in these efforts. For instance, the Electric Power Research Institute (EPRI) is working with partners, including the Edison Electric Institute, major fleets, and OEMs, to develop a platform (i.e., [EVs2Scale Initiative](#)) for critical EV stakeholders to submit vehicle electrification sales and deployment data to allow for better advance planning for future grid upgrades.



Corporate Electric Vehicle Alliance

Policy and regulatory support are critical to ensuring that such stakeholder collaboration efforts are successful in meeting the charging needs of heavy-duty ZEV fleets. Charging infrastructure funding programs, such as those included in the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act (IRA), must work to prioritize the deployment of chargers for MHDVs in addition to light-duty vehicles. Direct financial support mechanisms are, however, just one side of the coin.

Federal regulations, including strong Phase 3 truck emissions standards aligned with the ACT rule, will help give additional momentum to funding incentives like those in the IIJA and IRA by providing market certainty and ensuring a cohesive U.S. ZEV market nationwide. Other federal non-funding programs—such as the IIJA’s [EV Freight Corridor program](#), which has the potential to accommodate [85% of the nation’s long-haul charging needs](#) by 2030—are also key components of a successful national strategy for commercial MHDV electrification.

Conclusion

We applaud EPA for its commitment to adopting strong GHG emissions standards for HDVs and urge you to recognize the technical and economic feasibility of aligning these standards with the ACT rule, and U.S. climate and public health goals.

Thank you for your time and consideration of our comments.

Sincerely,

Sara Forni
Director of Electric Vehicles
On behalf of the [Corporate Electric Vehicle Alliance](#), led by Ceres

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