

# TESTIMONY



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## **MECA Oral Testimony at the US EPA Public Hearing on the “Proposed Rule for Greenhouse Gas Standards for Heavy-Duty Vehicles Phase 3” Docket No. EPA-HQ-OAR-2022-0985**

### *MECA Oral Testimony – Part 1*

Good morning, I’m Mike Geller, Deputy Director of MECA Clean Mobility. I am going to provide some general comments to highlight the breadth of GHG-reducing technologies that suppliers are commercializing. Just after noon today, my colleague Kevin Brown will provide additional comments on the Phase 3 proposal. For nearly 50 years, MECA has been the trade association representing leading suppliers of clean mobility technologies. Our members have a proven track record in developing and commercializing emission control, efficiency and electric technology for a wide variety of on- and off-road vehicles and equipment in all world markets.

In particular, our members provide the technologies that enable heavy-duty on-road vehicles to meet the most stringent criteria and GHG emission standards, including technologies that improve the engine efficiency as well as battery electric and hydrogen technologies that will help several types of heavy-duty vehicles transition to zero tailpipe emissions.

The portfolio of technology options available to reduce GHG emissions from heavy-duty trucks continues to grow in response to federal standards. For ICE-equipped trucks that will continue to be sold for many vehicle applications in the years to come, technologies like cylinder deactivation, turbochargers and hybridization will yield higher efficiency and reduced GHGs from the heavy-duty fleet.

Cylinder deactivation, now well-established on light-duty vehicles, has been demonstrated to enable both improved SCR efficiency as well as reduced GHG emissions in diesel applications. Driven turbochargers are able to perform all the functions of a supercharger, turbocharger, and turbo-compounder, and enable simultaneous control of criteria and GHG emissions. Based on extensive experience with passenger cars, hybrid electric vehicles, from 48V mild hybrid to plug-in hybrids, can yield significant fuel savings and CO2 reductions from commercial vehicles.

MECA members are also supplying technologies for vehicles that are powered by electricity and hydrogen, including battery electric, fuel cells and hydrogen combustion vehicles. This includes the

materials for batteries and fuel cells, which are critical as demand of BEVs is projected to rapidly increase. Suppliers are innovating high efficiency power electronics that will benefit the next generation of electric vehicles as well as fast charging technology. Fuel cell materials and technologies to improve fuel cell efficiency will help to increase affordability of these vehicles. Finally, for the most challenging to electrify heavy-duty segments, our members are commercializing technologies to enable clean hydrogen combustion, including fuel tanks, injectors, engine and aftertreatment components.

MECA commends EPA for releasing this Phase 3 proposal and supports technology neutral GHG standards. Our members are focused on delivering a wide range of mobility solutions to improve the overall emissions footprint of vehicles. Our industry has played an important role in the environmental success story of heavy-duty vehicles in the US and has continually supported efforts to develop innovative, technology-advancing, regulatory programs to deal with air quality and climate challenges. Thank you for the opportunity to comment today.

### *MECA Oral Testimony – Part 2*

Good morning, I'm Kevin Brown with MECA Clean Mobility which is a non-profit trade association representing the leading suppliers of clean mobility technologies for electric and conventional vehicles. We will be submitting detailed written comments summarized by my brief statement today.

MECA supports this proposal to reduce CO<sub>2</sub> emissions from heavy-duty trucks by setting performance standards that continue to improve the efficiency of today's engines while accelerating the introduction of electric and hydrogen powertrains across applications where they best meet the needs of end users. MECA believes that a wide range of engine and powertrain technologies, not included in Phase 2, can be further deployed to reduce the CO<sub>2</sub> emissions of combustion engines and EPA should set another round of engine standards for vehicle uses that may take longer to electrify. In particular, MECA believes that hybrid powertrains, and hydrogen internal combustion engines will see increased development in the next few years and EPA should add these carbon reduction technologies to their analysis in the final rule.

MECA supports the removal of multipliers for PHEV and BEVs as these technologies are sufficiently incentivized under government funding programs and the continued use of these multipliers may ultimately result in fewer trucks with electric and other advanced powertrains.

EPA correctly points out that the multiplier incentives are still needed for hydrogen fuel cell vehicles due to the early deployment stage of the technology. MECA believes it would be consistent to assign a multiplier to hydrogen engine powered trucks to reflect the infrastructure accelerating potential of this hydrogen technology that would support faster deployment of fuel cell powered trucks in vocations less suited to battery electric technology.

Finally, MECA supports that all HD vehicles should meet similar durability and warranty requirements to reflect confidence in the reliability of all technologies to fleet and truck owners.

In closing, MECA appreciates the hard work and dedication that EPA staff put into this important rulemaking proposal on the heels of the truck criteria pollutant standards finalized last year. The supplier industry remains committed to delivering the cost-effective clean mobility technologies to meet the goals of this rule. Thank you for your time and I am happy to answer any questions that you might have.

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