

TESTIMONY



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April 27, 2023

MECA Oral Testimony at the CARB Public Hearing to Consider the Proposed Advanced Clean Fleets Regulation

Good morning, Chair Randolph and members of the Board, I'm Kevin Brown with MECA which is a trade association representing the leading suppliers of clean mobility technologies for electric and conventional vehicles that reduce GHG and criteria emissions. We have also submitted written comments summarized by my brief oral statement today.

MECA strongly supports the proposed expanded fleet flexibilities provided in the proposed 15-day changes and we look forward to working with staff in the future on the further alignment of the required ACF fleet sales and Advanced Clean Truck manufacturing provisions.

Our further suggestions for CARB's consideration are that:

- CARB should give special consideration of the infrastructure accelerating potential of zero-carbon hydrogen-fueled combustion engines. This technology would support CARB's zero carbon goals while facilitating hydrogen refueling infrastructure development and lower the costs for future fuel cell truck operations for fleets.
- We also urge CARB to revisit the Zero Emission Powertrain (ZEP) requirements to establish improved performance and durability standards for the batteries and components on electric trucks analogous to what ACC2 did for electric cars. Stronger durability requirements provide confidence in the reliability of electric technology to fleet managers and truck owners.
- Finally, the advancement of the 100% ZEV sales requirement to 2036 will make ACF implementation challenges even more challenging. Although the federal Inflation Reduction Act (IRA) incentivizes Zero Emissions Truck purchases through 2032, we believe that infrastructure readiness will determine the market rather than truck availability. MECA believes allowing more market analysis time is appropriate before determining whether 2040 or 2036 is the most credible date for the 100% sales requirement.

In closing, MECA appreciates the hard work and dedication that CARB staff put into this important rule making. Our industry remains committed to delivering cost-effective technologies that simultaneously advance electric vehicles while also achieving ultra-low NOx pollutant reductions from remaining trucks covered by the exemptions in this proposal. Thank you for your time and I am happy to answer any questions that you might have.