

TESTIMONY



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September 28, 2023

**MECA Oral Testimony at the NHTSA Public Hearing on the
“Proposed Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for
Model Years 2027-2032 and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for
Model Years 2030-2035”
Docket No. NHTSA-2023-0022**

Good afternoon, I am Michael Geller, the Deputy Director for MECA Clean Mobility. For nearly 50 years, MECA has been the trade association representing leading suppliers of clean mobility technologies. From clean combustion to electrification, our members invest in jobs, manufacturing capacity and innovation to develop and commercialize emission control, efficiency, and electric technology for a wide variety of on- and off-road vehicles and equipment in all world markets.

Specific to this proposal, our members provide the technologies that enable passenger cars and medium-duty vehicles to meet the most stringent fuel efficiency standards. In the electric vehicle space, MECA members are supplying EV components from critical battery raw materials, power electronics, motors, and EV transmissions. Because infrastructure is so critical to the pace of EV penetration, our members are commercializing the EV chargers and components to enhance grid resiliency.

NHTSA noted that the EPA and NHTSA proposals differ in important ways, mainly due to inconsistencies in statutory authorities. We support coordination between the agencies to ensure both sets of standards provide technology neutral pathways and foster multiple solutions to meeting US GHG and fuel economy goals. It is vital that regulated parties have the ability to comply with both rules through the deployment of consistent technology solutions.

As demonstrated by the technology modeling in this proposal, HEVs and PHEVs can help vehicle manufacturers comply with proposed fuel economy standards. Rather than using retrospective studies to assign PHEV utility factors, they should be based on more recent and projected future PHEV models with longer all electric range, which is likely to result in a shift to greater electric operation. Hybrid technologies can achieve fuel efficiency benefits of 30-60% compared to their conventional vehicle counterparts through the deployment of low-capacity batteries. This will be important in the

next 5-10 years to reduce critical battery material supply chain pressures while providing car owners and manufacturers more choices.

To support supplier investments in clean mobility components for light and heavy-duty vehicles, MECA encourages ongoing efforts by NHTSA, alongside EPA, Energy and Labor to ensure that our nation's supply chain, grid and charging infrastructure match the needs of our country's transportation system.

In closing, we thank NHTSA staff for their hard work and dedication to this important rule making. Technology-neutral, performance-based regulations have always been a proven strategy for meeting CAFE fuel efficiency goals through a diversity of competing, cost-effective technology solutions. Our industry remains committed to working with NHTSA on the challenges and opportunities that lie ahead to achieve the goals of the CAFE and heavy-duty fuel efficiency programs. Thank you for your time and I am happy to answer any questions that you might have.