



Corporate Electric Vehicle Alliance

May 16, 2022

Administrator Michael Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

**Re: Control of Air Pollution from New Motor Vehicles: Heavy-Duty Engine and Vehicle Standards;
Docket ID No. EPA-HQ-OAR-2019-0055**

Dear Administrator Regan,

I write on behalf of the [Corporate Electric Vehicle Alliance](https://www.ceres.org) – a coalition of 30 major companies and fleet operators that represent over \$1 trillion in annual revenue and collectively own, lease, or operate more than two million fleet or networked vehicles in the United States.

As a representative of this coalition, I am writing to urge you to strengthen the proposed heavy-duty truck standards. Our members see climate change as a significant risk and reducing greenhouse gas (GHG) emissions as a major economic opportunity.

Corporate Electric Vehicle Alliance members share a common goal of electrifying their on-road fleets and networked vehicles as well as reducing their transportation carbon footprint, and recognize that strong standards are necessary to affect this critical transition. In fact, a recent [survey](#) of Corporate Electric Vehicle Alliance members demonstrates robust demand for zero-emission vehicles (ZEVs) over the next five years. However, while some ZEV classes are becoming increasingly cost competitive with conventional models, electric medium- and heavy-duty vehicles can be up to three to four times the purchase price of a comparable conventional model. Strong policies are necessary to ensure the availability, adequate production volume, and sufficient variety of zero emission trucks to meet the needs of commercial fleets.

While our members are working to do their part as individual companies, we need strong standards to ensure the widespread availability of clean trucks in the U.S., as well as to drive the economies of scale that will accelerate the necessary transition to electrification. The U.S. Environmental Protection Agency's (EPA) proposal projects a ZEV sales share of 1.5% in key market segments in 2027, which falls far short of corporate demand as well as what will be needed to meet climate goals and several states' regulatory requirements.

Further, given that medium- and heavy-duty vehicles are the largest source of nitrogen oxides (NOx) in the transportation sector, it is critical to strengthen the proposed NOx standards, which were last updated twenty years ago. Disadvantaged communities have long borne the brunt of negative health and air quality impacts from truck pollution, and we need to reduce these pollutants to the maximum extent possible.

In sum, on behalf of the Alliance, I urge EPA to strengthen the proposed standards, which are not sufficiently stringent to accelerate the cost-effective deployment of electric commercial trucks at the



rate and scale that we envision, are inconsistent with climate goals, and fail to adequately reduce air pollution in disadvantaged communities.

Thank you for your consideration.

Sincerely,

Sara Forni

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

CC:

Ali Zaidi, Deputy National Climate Advisor
White House Office of Domestic Climate Policy

Austin Brown, Sr. Director for Transportation Emissions
White House Office of Domestic Climate Policy

Gina McCarthy, National Climate Advisor
White House Office of Domestic Climate Policy

Steve Cliff, Deputy Administrator
National Highway Traffic Safety Administration

Jennifer Granholm, Secretary
U.S. Department of Energy

Jeremiah Baumann, Deputy Chief of Staff
U.S. Department of Energy

Tarek Shah, Chief of Staff
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Matthew Tejada, Director
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Bill Charmley, Director Assessment and Standards Division
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Sarah Dunham, Director
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Alejandra Nunez, Deputy Assistant Administrator for Mobile Sources
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