



May 16, 2025

Don Brown
Illinois Pollution Control Board
60 East Van Buren, Suite 630
Chicago, IL 60605

CC: The Clerk's Office

RE: Response to Public Comment, R 2024-017, Proposed Advanced Clean Truck Rule: Section 35 Ill. Adm, Code Part 242

Dear Chair Barbara Flynn Currie and members of the Illinois Pollution Control Board,

The Electrification Coalition (EC) is writing today in response to the public comments and providing additional data and support for the rulemaking process. The **EC is responding to specific comments related to infrastructure, market feasibility, and economic risks as barriers to the adoption of the Advanced Clean Truck Standard (ACT rule).**

The EC is a nationally recognized, non-partisan, non-profit organization focused on achieving mass adoption of electric vehicles (EVs) through stakeholder engagement, technical support, direct implementation, and policy initiatives. We believe that mass deployment of EVs is critical to enhancing the fuel diversity and resilience of our nation's transportation system, which will support our national and economic security and public health.

As noted in our initial comments, the EC is in support of the ACT rule as a complementary policy to current incentives and investments in Illinois that will drive more investment, enable cost-effective electrification of the medium- and heavy-duty vehicle (MHD) sector, and expand public health and economic benefits for communities and businesses.

Additionally, some of the comments highlighted infrastructure, market feasibility, and economic risks as challenges to adopting the ACT rule. However, Illinois continues to exhibit growing consumer interest in EVs as new EV models roll out, the charging network grows yearly, and manufacturers scale production capabilities.

- The Illinois EV market continues to show significant consumer interest and continues to see record purchases each year. In 2024, Illinois consumers purchased over 41,000 electric vehicles and reached 8 percent market share in the last quarter of the year.
- Charging infrastructure deployment also continues to grow as Illinois implements federal incentives despite program suspensions, such as **\$25 million** from the *National Electric Vehicle Infrastructure Program*, **\$7.1 million** from the *Electric Vehicle Charger Reliability and Accessibility Program*, and over **\$129.4 million** from the *Charging and Fueling Infrastructure Discretionary*



Program. This comes in addition to state incentives from the *Climate and Equitable Jobs Act*, which has awarded over **\$25.1 million** in EV charging rebates and the *VW Settlement* with **\$12.6 million** for new charging ports. Illinois boasts over 5,000 total ports, with thousands more expected to come online by the end of 2025, according to the Illinois Environmental Protection Agency (IEPA).

- Illinois is home to American EV manufacturer Rivian, which just announced a joint venture with Volkswagen Group with investments of up to **\$5.8 billion** aimed at accelerating innovation, increasing scale, and lowering the cost of owning an EV for Americans. Thanks to Rivian, Amazon has expanded its electric delivery fleet from **1,000 in 2022 to over 20,000 as of today**. Many of these were deployed in Chicago initially and have expanded to other Illinois communities. Another Illinois project, TCCI's new, **\$45 million** Clean Energy Innovation Hub, will strengthen the U.S. EV supply chain, provide training and research opportunities, and create numerous jobs.
- Illinois also boasts several fleets already committed to purchasing MHD EVs across the state. The state is third in the nation for electric school bus commitments, with over **600 committed** and over **200 already operating**. Businesses also continue to electrify their fleet, such as Groot Industries, with **nine electric terminal trucks**, ComEd with **two electric bucket trucks**, Pace's **49 committed electric transit buses**, and WasteNot Compost—Illinois' largest electric-fleet owner—with **over 30 light-duty and MHD electric vehicles**. Public sector fleets have also begun their transition to MHD EVs such as Forest Preserves of Cook County with **two electric garbage trucks**, and the City of Chicago with **25 electric transit buses**, as part of its goal of reaching 100% zero-emission vehicles in its municipal fleet by 2035.

Governor Pritzker, the Illinois legislature, and major utilities are also attracting private investment and providing the supporting policies needed to overcome challenges highlighted in comments and support fleets in the transition to meet targets outlined in the ACT Rule. These include:

- IEPA is the recipient of a Climate Pollution Reduction Grant award of over **\$430 million** – of which a significant portion will go towards the deployment of heavy-duty EV and EV charging infrastructure for small and medium fleets.
- IEPA was awarded **\$100 million** for their *Equitable Future-Ready Electrification Infrastructure for Green Heavy-duty Transportation (E-FREIGHT)* Program via the Charging and Fueling Infrastructure Program.
- IEPA was awarded over **\$95 million** for the deployment of battery-electric drayage trucks and charging infrastructure, via the U.S. EPA's Clean Ports Program.
- Utilities like Commonwealth Edison and Ameren are also stepping up, recognizing Illinois' transportation electrification opportunity. Their latest Beneficial Electrification Plans have been approved for a combined **\$254 million** for programs including rebates and incentives for EVs, EV charging stations, and grid infrastructure upgrades.



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- The opportunity and market conditions in Illinois have attracted nearly \$11 billion in private investment in the EV manufacturing and supply chain.

These efforts will only increase with the ACT rule and cement Illinois as both a regional and national leader in electric truck deployment, generating more manufacturing jobs across the EV supply chain, providing significant cost savings to businesses and consumers, and fueling the local economy. Moreover, it will accelerate Illinois' goal set forth in the Clean and Equitable Jobs Act of deploying one million EVs in the state by 2030. Illinois' support of the MHD EV industry is critical, as both Illinois and the region are vital junctures in the transportation of goods across the nation.

The ACT rule combined with complementary incentives policies will uplift the American automotive industry transition at a crucial time when China dominance of the entire EV supply chain, from critical minerals and battery production to new and competitively priced EVs, puts thousands of domestic jobs in peril. Therefore, we continue to urge the Illinois Pollution Control Board to support Illinois' adoption of the ACT rule.

Thank you for the opportunity to submit comments in support of the Advanced Clean Truck Standard.

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Anne Blair

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