

RIVIAN



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Submitted electronically to: don.brown@illinois.gov

Public Comments in the Matter of *Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242* (Case #: R2024-017)

To the Illinois Pollution Control Board,

Rivian Automotive, LLC, ("Rivian") is pleased to comment in the matter of *Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242* (Case #: R2024-017).

As a manufacturer of electric vehicles ("EVs") that can meet the requirements of the proposed standards, Rivian supports the rule proponents' regulatory proposal and encourages the Illinois Pollution Control Board ("IPCB" or "the Board") to vote in favor.

Strong state-level action to reduce transportation emissions and build a clean energy economy has never been more important. From the Clean Energy Jobs Act to Governor Pritzker's bold goal to put 1 million EVs on the state's roads by 2030, Illinois has made itself a national leader and hub for EV manufacturing.

The regulatory proposal before the Board builds on this legacy of action. With its ambitious but feasible targets, the proposal would set Illinois apart as the Midwest's undisputed priority market for EVs, giving adjacent industries—from EV suppliers to charging providers—investment certainty while bringing cleaner air to communities across the state.

About Rivian

Founded in 2009, Rivian is an independent U.S. company. With over 16,000 employees across the globe, Rivian's mission is to Keep the World Adventurous Forever. Rivian's focus is the design, development, manufacture, and distribution of all-electric adventure vehicles, specifically pickups, sport utility vehicles ("SUVs"), and commercial vans. We manufacture our vehicles in Normal, Illinois, where we employ more than 7,400 people.

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Rivian brought the first modern electric pickup to market in 2021 when we launched the R1T, followed shortly thereafter by the R1S SUV and the EDV commercial van for Amazon. The R1T and R1S provide all-electric options in segments where added utility is a necessity. The R1T has an EPA-certified range of up to 410 miles. The R1S is certified at up to 400 miles. The truck also features 11,000lbs of towing capacity, while the R1S is a seven-passenger full-sized SUV. Both are well-equipped for off-roading in a range of climates. Separately, our Class 2b commercial vans eliminate tailpipe emissions from last-mile delivery. Rivian is committed to producing 100,000 vans for our launch customer, Amazon, with more than 15,000 already in service in 800+ U.S. cities. Beyond our vehicle lineup, Rivian is also building a network of DC fast chargers across the country known as the Rivian Adventure Network ("RAN"), including sites in Illinois.

Rivian Strongly Supports the Clean Car and Truck Standards

Rivian's mission to Keep the World Adventurous Forever is made manifest in its commitment to the environment and addressing climate change. We strongly support emissions regulations and EV sales targets as core to our values and vision for the world. Implementation of the regulatory proposal, including the Advanced Clean Cars II ("ACCII") and Advanced Clean Trucks ("ACT") rules, will drive critical reductions in greenhouse gas ("GHG") emissions and air pollution in Illinois, while rapidly growing the state's EV market. The rules would have important benefits for car buyers and businesses, and ample evidence demonstrates their feasibility.

ACCII and ACT are Feasible

Both rules were finalized after a yearslong development process incorporating stakeholder input—including from vehicle manufacturers. While the rules set ambitious goals, cost-effectiveness and feasibility are at the core. Sales requirements ramp up over time and, in the case of ACT, vary by vehicle class. Both ACCII and ACT use averaging, banking, and trading frameworks to facilitate manufacturer compliance, a tried-and-tested approach that lowers overall compliance costs for industry. Additional flexibilities include allowances for credit pooling by obligated light-duty automakers, extended timelines to make up deficits, and the option for medium- and heavy-duty ("MHD") manufacturers to meet some of their compliance obligations using the sale of hybrid trucks, to name just a few.

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Industry is well positioned to deliver on the requirements of both rules.

- **Hundreds of MHD EV models are now on the market.** According to CALSTART, as of the first quarter of 2023 manufacturers offered 208 MHD ZEV models for sale in the United States and Canada.¹
- **Industry is ahead of schedule in complying with ACT in other states.** In California and Oregon, the first ACT states to begin credit reporting, industry has been achieving the regulation's EV sales requirements years ahead of time. Rivian's products are contributing significantly to this success.² This reveals the emergence of a robust manufacturing infrastructure and product pipeline in the MHD industry that will only grow as more ZEV manufacturers, responding to customer demand and regulatory signals from rules like ACT, hit their manufacturing stride in the coming years.
- **Overcompliance has been the norm under Advanced Clean Cars I.** Historically, automakers have significantly overcomplied with California's light-duty EV sales requirements under Advanced Clean Cars I.³
- **Early credits will allow manufacturers to build up their credit banks.** Early credit provisions under ACCII and in the proponents' regulatory proposal for ACT mean that manufacturers can earn credit toward future compliance needs years before their obligations begin. Rivian strongly supports early credit provisions because they accelerate EV sales, thus delivering the associated environmental benefits sooner while giving manufacturers the chance to build their credit banks ahead of time.

¹ Owen MacDonnell, Yin Qiu, Shuhan Song, and Xiaoyue Wang, CALSTART, *Zero-Emissions Truck and Bus Market Update*, June 2023, available at www.globaldrivetozero.org/site/wp-content/uploads/2023/06/Final_ZETI-Report-June-2023_Final.pdf.

² California Air Resources Board, *Advanced Clean Trucks Compliance and Incentives Update*, available at www.arb.ca.gov/resources/documents/advanced-clean-trucks-compliance-and-incentives-update, accessed on November 26, 2024; <https://www.oregon.gov/deq/aq/programs/pages/mdhdzev.aspx>.

³ California Air Resources Board, *Annual ZEV Credits Disclosure Dashboard*, available at www.arb.ca.gov/applications/annual-zev-credits-disclosure-dashboard.



ACCII and ACT Benefit Consumers and Businesses

The regulatory proposal will cut pollution and improve public health but the benefits don't stop there. ACCII and ACT will:

- **Increase EV choice.** Even today, car buyers face a lack of truly compelling EV choices in the mass market. In the light-duty market, ACCII will help drive a greater diversity of product offerings by pushing all automakers to ramp up their production and sale of EVs across form factors and utility profiles. For our part, Rivian is well on its way to launching R2 and R3, the vehicles that will introduce Rivian to the mass market and dramatically scale up our impact at lower price points. Establishing the ACCII requirements in the state will also ensure that Illinoisans are at the front of the line for the full range of new EVs. For MHD vehicle buyers, the ACT rule will bring a robust supply of electric vans and trucks to Illinois, giving fleets every chance to realize the savings and benefits that come from electrifying their operations. Without the rule, Illinois risks ceding ground as a priority market for these products to other ACT states.
- **Improve Consumer Confidence.** ACCII's consumer assurance measures, governing things such as battery durability and warranties, will provide greater confidence in EV technology to shoppers in both the new and used EV markets.
- **Support long-term planning by industry and government.** With clearly defined, long-term EV sales targets, the regulations allow businesses up and down the value chain, not to mention governments and adjacent industries, to make plans and invest. Certainty is critical for utilities to reliably plan for load growth, for charging providers to build infrastructure, and for manufacturers like Rivian to source supply and unlock savings.

Conclusion

Rivian welcomes the proponents' regulatory proposal to implement the ACCII and ACT rules in Illinois. The regulations are feasible and will also benefit consumers and industries adjacent to vehicle manufacturing. We encourage the Board to support the proposal and showcase Illinois' EV leadership on a national stage.

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Please contact me with any questions about our comments and support for the rules. Rivian looks forward to working with you to accelerate transportation electrification in Illinois.

Sincerely,



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