



December 3, 2024

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

CC: The Clerk's Office

RE: Written Comments in Support of the Advanced Clean Truck Rule as a part of R2024-017.

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

The Electrification Coalition is writing today in support of the Advanced Clean Truck standard, which would require manufacturers of medium- and heavy-duty vehicles to sell an increasing share of zero-emission models in Illinois.

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.

Over the last five years, the EC has built and implemented an increasingly robust strategy to accelerate EV action federally, in Illinois, and nine other states, while also increasing our reach and impact through a growing network of cities, states, and private sector partners, such as the members of the EC's Business Council. Building upon this early momentum created through our state- and city-level programs, the EC is working to increase the impact in our current states while expanding efforts further in freight electrification with initiatives including our Electric Freight Consortium and our Port Electrification Network, designed to educate, support, and mobilize freight and port electrification implementers for accelerated action.

The U.S. transportation sector's overwhelming dependence on the volatile global oil market – and the unreliable actors who influence it. Therefore, it is critical that we diversify our transportation fuels and support the growing domestic opportunity of electrification.

At the same time, with growing consumer demand for electric vehicles, our domestic vehicle manufacturers are mid-transition to electrifying their portfolios to stay competitive, both at-home and abroad. However, China's current dominance of the entire EV supply chain, from critical minerals and battery production to new and competitively priced electric vehicles. It is imperative that the United States supports our growing EV industry in this transition.



Electrification Coalition

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Governor Pritzker has taken great strides to establish Illinois as a national leader in the manufacturing and adoption of transportation electrification technologies through enactment of key policies including the Climate and Equitable Jobs Act and the Reimagining Electric Vehicles Act. Landmark federal policies like the Inflation Reduction Act and the Infrastructure Investment & Jobs Act also represent billions of dollars of investment in critical policies and programs to support electric medium- and -heavy-duty vehicles and the needed infrastructure to charge them. However, state leadership is still needed to assist in the transition of the medium- and heavy-duty sector towards electrification.

The ACT rule is designed to reduce costs of zero-emission MHDVs by requiring manufacturers to increase model availability, which helps meet the needs of fleet operators across multiple vehicle classes and further develop the market for these vehicles. The ACT rule will also drive investment in clean transportation research and development. We expect that adopting the ACT rule will enable cost-effective electrification of MHDVs at the pace and scale needed to meet climate and air quality goals, while delivering public health and economic benefits for communities and businesses alike.

Numerous states have already adopted ACT, and, the more states that adopt ACT, the greater the market-forcing benefits, thereby lowering costs and creating a more stable and self-sustaining market. Illinois' adoption of the Advanced Clean Truck standard would send a powerful market signal that Illinois consumers and businesses want and expect the opportunity to purchase electric trucks, and support growing manufacturing jobs in Illinois for companies including Lion Electric and Rivian. In addition to supporting the automotive industry transition, EVs bring significant benefits to customers enabling the use of electricity as a price stable fuel. Therefore, we urge support for Illinois' adoption of ACT.

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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