Hearing Officer for the PCB members

2) On page 2 of your testimony, you state that the proposed rules will fail to achieve the emissions reduction goals because the rules do not apply to trucks registered and sold outside of Illinois like our neighboring states of Indiana, Missouri, and Wisconsin.

a. Do you have any information on the breakdown of trucks operating on Illinois roads that are owned/registered in Illinois as opposed to those owned by/registered to out-of-state entities? If so, please submit such information into the record. We do not have that information available, however Illniois is geographically at the center of the country and the center of the North American supply chain, and we have a significant amount of trucks operating in Illinois that are registered in other states.

b. Please comment whether the adoption of the proposed rules would reduce the number of trucks owned/registered in Illinois with companies moving their location outside Illinois to neighboring states.

> Based on our experience, the adoption of the proposed rule would reduce the number of trucks owned/registered in Illinois and the number of companies based in Illinois. We experienced the impact of a fee on the trucking industry in 2004 known as the Commercial Distribution Fee, a 36% surcharge on truck license plates, that increased the cost of a semi-truck license plate by $1,000 per truck per year. In the years that followed, Illinois lost several thousand trucking companies and tens of thousands of truck license plates.

c. Please comment on whether any other midwestern states are considering the adoption of advanced clean truck standards rules. Assuming states comprise the Midwest region defined by the U.S. Census Bureau; I am not aware of any other midwestern states considering ACT adoption.

3) On page 2 of your testimony, you state, "[j]umping to 20% Electric Truck Sales in less than two years as this regulation would require is simply not possible." Please comment on what would be a realistic timeframe that would make the rules work for the trucking industry to achieve 20% sales as well as providing for charging infrastructure. It would be very hard for me to estimate what it would take to achieve 20% sales and charging infrastructure, if that could ever be achieved.

Illinois EPA

1) In your testimony, you state, in part, "For instance, Illinois would need to achieve at least 20% electric truck sales by 2028 when there are virtually zero electric trucks available for sale in the state today. As of today, there are 355,000 interstate trucks registered in Illinois and another 216,000 intrastate trucks registered here. Of the 571,000 trucks registered in this state, there were 272 new Electric Trucks registered in Illinois in 2024. That's 0.05% of all trucks." R24-17, Pre-Filed Testimony of Matthew Hart, January 21, 2025, at 2.

   a. For the statistic that there are 355,000 interstate trucks registered in Illinois, you cite to a custom report from the Federal Motor Carrier Safety Administration's website. Can you please provide a copy of that report? Please see Exhibit 4, which comes directly from the Federal Motor Carrier Safety Administration website.

   b. For the statistic that there are 216,000 intrastate trucks registered in Illinois, you cite to an Illinois Secretary of State report. Could you please explain what this report is and how it supports your contention? Please see Exhibit 5, which comes directly from the Illinois Secretary of State.

   c. For the statistic that there were 272 new electric trucks registered in Illinois in 2024, you cite to "ATP/S&P Global Mobility, 2024 Data through November." Could you please provide a copy of that data? Further, could you please advise how many new trucks, overall, were registered in Illinois in 2024? Exhibit 1 shows ATD/S&P YTD IL new vehicle registration data for Classes 3-8 through November 2024. Total new registrations for these Classes over this period were 38,118 vehicles. BEVs comprised 0.7% of this total.

   d. In your view, why have Illinois businesses registered only a relatively small number of electric trucks to date? What concerns do your members have about electric trucks relative to other vehicles? Cost? Range?
   Illinois businesses have registered an extremely small number of electric trucks to date because they are essentially not available. The companies who make electric trucks is very small. In addition, two electric truck manufacturers also just ceased operations, including Lion Electric which was based in Joliet. Two of our largest truck dealers in Chicago have sold a total of one electric truck between the two of them: one truck.

The concern that our members have about electric trucks relative to other vehicles is the cost of the electric trucks compared to diesel trucks and the lack of charging or fueling infrastructure for trucks. According the American Transportation Research Institute, a new Class 8 Electric Truck can be as much as $450,000, compared to a similar diesel truck that can cost $150,000.

Range is also a concern. Most Class 8 Electric Vehicles have a maximum range of 200-250 miles, assuming ideal weather conditions. That compares to a diesel truck that can have a range of over 1,000 miles.

In addition, we are not aware of a single, public truck charging station anywhere in Illinois. Not one. The three largest truck stop companies (Pilot, Love's and TA/Petro) have 78 truck stops across the state. None have a truck charger.

e. What is the average mileage range on a single charge for an electric truck? For Class 8 BEV tractors available under California's HVIP program, the average listed mileage range (on a single charge) is 186 miles. Source: HVIP Spec Sheets for Class 8 BEV Tractors, https://californiahvip.org/vehicle-category/heavy-duty/

2) You state that "[s]tudies from the American Transportation Research Institute show that meeting the same freight demands with electric trucks could require as much as 34.3% more vehicles on the road." R24-17, Pre-Filed Testimony of Matthew Hart, January 21, 2025, at 2-3. Could you please provide a copy of the study, or studies, supporting your contention? *Renewable Diesel – A Catalyst for Decarbonization*, American Transportation Research Institute, April 2024. https://truckingresearch.org/2024/04/renewable-diesel-a-catalyst-for-decarbonization

3) Citing to the "Clean Freight Coalition," you state that, nationally, the transition to zero-emission trucks, "is projected to cost $1 trillion, with Illinois' share estimated at $36 billion." R24-17, Pre-Filed Testimony of Matthew Hart, January 21, 2025, at 3. Could you please provide a copy of the analysis supporting your contention? *Forecasting a Realistic Electricity Infrastructure Buildout for Medium- & Heavy-Duty Battery Electric Vehicles*, Clean Freight Coalition, March 19, 2024. https://www.cleanfreightcoalition.org/sites/default/files/2024-03/RB%20Study%20Report_final%5B111225%5D.pdf

4) You state that the proposal before the Board "affects the industry that transports 95% of the manufactured freight in Illinois." Could you please provide a copy of the analysis supporting your contention? R24-17, Pre-Filed Testimony of Matthew Hart, January 21, 2025, at 3. Please see Exhibit 6 which is from the American Transportation Research Institute.

Environmental Groups ("Proponents")

1) Do you oppose all of the Proposed Rules, or only the proposed ACT rule? If you oppose any aspects of the Proposed Rules other than the ACT rule, please identify the portions of your testimony that address each portion of the Proposed Rules that you oppose other than ACT. Our opposition focuses on the unachievable regulations which would affect new trucks sales in Illinois, specifically the Advanced Clean Trucks (ACT), and Heavy-Duty Low NOx Omnibus (Low NOx [Nitrogen Oxide]) regulations.
2) At page 1 of your testimony, you state: "The trucking industry is proud of our record of reducing emissions: a goal that we have achieved WITHOUT mandates like what is proposed." How do you determine if the trucking industry has met the "goal" of reducing emissions? The trucking industry is continually reducing emissions by replacing existing trucks with new trucks that have the newest, most effective emission control and safety systems on the road. The proposed regulations will restrict these efforts by limiting the availability of new trucks sold in Illinois.
3) Are there currently any legal mandates related to emissions from heavy-duty on-road vehicles? As you likely know, federal tailpipe emissions regulations have been in place for more than 50 years and tampering with vehicle emission controls is illegal.
4) On page 1 of your testimony, you state "there are many different pathways to achieve the goal of reduced emissions." Please describe those "pathways." Obviously, fleet turnover is the primary method of reducing emissions. This requires new trucks to be available and capable of doing the job which is required. Use of alternative fuels is another pathway, including the use of renewable diesel and renewable natural gas. Incentive programs to remove the oldest trucks and replace them with new or newer trucks are another option. ITA would be happy to identify and discuss achievable options with the state.
5) Are you aware of the National Ambient Air Quality Standards under the Clean Air Act? Is Illinois in compliance with those air quality standards? According to the U.S. EPA Green Book, Illinois attains five of six NAAQS pollutants, including particulate matter (PM-10 & PM-2.5). Illinois does not meet the federal 8-hour ozone (2015) standard. Illinois' ozone Design Values (0.074 – 0.077 ppm - the official measurement of air quality levels) are much closer to meeting the federal ozone standard of <70 ppm than California's DVs, which range up to 0.106 ppm. Illinois is one of 22 such states with areas above the 0.070 ppm federal standards.
6) Please attach a resume or CV with your relevant experience. Please see Exhibit 7 attached.

7) Do you have any education or training in climate science, public health, or healthcare? I am a trucking industry advocate with 20 years of real world experience in the trucking industry.
8) You cite no data, sources, or analyses to support your testimony under topic #1, "The Proposed Standards Will Not Improve the Environment," which appears on page 2 of your testimony, correct? My written testimony is an analysis that includes sufficient data and sources.
9) Please refer to page 2 of your testimony, where you list two reasons why you assert the Proposed Rules "will fail to achieve this goal" of "reduc[ing] emissions and improv[ing] air quality." Do those two reasons constitute the entire basis for that opinion? My testimony is based on my 20 years of industry experience.
10) Please refer to page 2 of your testimony, where you state, *"many trucks operating on Illinois roads are owned by out-of-state companies. These trucks, exempt from the regulations, will continue operating within Illinois, negating any environmental benefit."*
    a. When you say *"negating any environmental benefit,"* do you mean that literally? In other words, is it your opinion that the presence of out-of-state trucks in Illinois means the Proposed Rules will have absolutely no environmental benefit? If you did not use the word *"negating"* literally, please describe what you mean and provide all data or analysis you relied on to support your opinion. See Exhibit 2 which shows California registration data reflecting the impact of ACT and Low-NOx Omnibus on year-over-year truck registrations. In 2024, registrations of new trucks, and their associated environmental benefit, have decreased by as much as 55% YOY on a monthly basis and more than 23% YOY, nearly double the decline in national new truck registrations.
    b. Do you assert there are no trucks operating on Illinois roads that are registered in Illinois? No.
    c. Are you aware that the calculations relied on in the Proposed Rule only examined *"on-road vehicles registered in Illinois,"* but still found that the ACT rule would reduce annual greenhouse gas emissions by 1.6 million metric tons of CO_2e by 2050, provide $6.5 billion in monetized benefits, and prevent nearly 21,700 respiratory illnesses and lost workdays? I have read the claims made in the proposed rule.
11) On page 2 of your testimony, you write that the Proposed Rule would have "no preparation period.
    a. Do you acknowledge that it is currently 2025 and the Proposed Rules would not go into effect until vehicle Model Year 2029 at the earliest? It depends on when adoption occurs. Section 177 of the Clean Air Act requires states to adopt

California standards at least two years before commencement of such model year.

b. You note that California has "a credit system that rewards early compliance." Are you aware that the Proposed Rules include the same type of early compliance credits? The difference being, as reflected in the registration data, Illinois has generated very few early compliance credits.

12) Do you acknowledge that the Proposed Rules apply to only the sale of new vehicles and do not include any provisions related to the proportion of all existing vehicles on the road at a given time? As stated by CARB Executive Officer, how manufacturers meet the requirements, "essentially pushes the ACT regulation's requirement onto the dealership or fleet." (CARB ACTrucks Memo to Board 2024/09/25) And while this does affect new truck sales, it also impacts the existing vehicles' fleets own by restricting their ability to buy new replacement vehicles.

a. On page 2 of your testimony, you state, "there are virtually zero electric trucks available for sale in the state today." Please provide all data and sources you relied on as the basis of this statement. See Exhibit 1.

b. On page 2 of your testimony, you state: "As of today, there are 355,000 interstate trucks registered in Illinois and another 216,000 intrastate trucks registered here." You cite data from FMCSA and the IL Secretary of State.

i. Is it correct that you calculated the total number of trucks registered in IL by adding together the data from the FMCSA and the IL Secretary of State? I did add the data from the FMCSA and the data from the IL Secretary of State. Data from the FMCSA represents the Interstate Trucking Companies. Data from the IL Secretary of State is for Fiscal Plates only, which represents Intrastate Trucks.

ii. The FMCSA page you cite is an interactive database. Please explain how you selected the data in order to determine that there are 355,000 interstate trucks registered in IL. The data is from the Federal Motor Carrier Safety Administration for registrations in Illinois.

iii. Please explain how you determined that combining figures from these two sources does not result in double-counting vehicles. The figures are data from the FMCSA and from the IL Secretary of State.

c. On page 2 of your testimony, you state: "Of the 571,000 trucks registered in this state, there were 272 new Electric Trucks registered in Illinois in 2024. That's 0.05% of all trucks."

i. For your claim that there were 272 new electric trucks registered in 2024, you cite in footnote 3 to "ATP/S&P Global Mobility, 2024 Data through November." Please attach the relevant document and explain how S&P

acquires this data. See Exhibit 1. Contact S&P directly regarding questions about the data collected of and pricing of monthly new vehicle registration data for United States.

d. On page 2 of your testimony, you state that "Jumping to 20% Electic [sic] Truck Sales in less than two years as this regulation would require is simply not possible." Please provide the data and research you relied on to make that assertion. There is no data available for something that does not exist.

13) Please provide the basis for your claim on page 2 that truck charging infrastructure "can take up to 9 years" in Illinois. That is the timeframes being experienced in California per the California Public Utilities Commission "Decision Establishing Target Energization Time Periods and Procedure for Customers to Report Energization Delays." https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M540/K806/540806654.PDF

a. On page 2 of your testimony, you write that "truck charging infrastructure in Illinois does not exist beyond a handful of private companies." Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it. Refer to CALSTART's "National Medium & Heavy Duty Zero-Emission Infrastructure Map," https://calstart.org/mhd-infrastructure-map.

b. On page 2 of your testimony, you write, "fueling an electric truck requires much higher amounts of electricity than charging a car, which requires major upgrades to the current grid." You cited data focused solely on California, and you cite to a California Public Utilities Commission Order, correct?

i. If not, please provide all other data or information you relied on in making this statement. See previously cited Clean Freight Coalition study.

ii. Why do you believe it is appropriate for the Board to consider such information about charging infrastructure from California? Yes, since these rules must mirror California requirements.

14) On page 2 of your testimony, you state: *"Electric trucks are simply not available for sale in Illinois."* Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it. See Exhibit 1.

a. On page 2, you state that "Illinois truck retailers would be forced to sell vehicles that are more expensive and less practical due to a lack of charging or fueling infrastructure." Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it. See previously cited documents.

i. Are you aware that the Proposed Rules would never require 100% of heavy-duty new vehicle sales be electric?[2] That is not correct. The most recent regulation

adopted by the California Air Resources Board on October 24, 2024, includes the following language,

1963.6, 2036 and Subsequent Model Year Requirements

(a) For 2036 and subsequent model years 100 percent medium- and heavy-duty ZEV requirements, see title 13, California Code of Regulations, Article 3.5, section 2016.

To maintain identicality with the CARB regulation, the state would need to adopt this same language.

b. On page 2, you state that "[e]lectric trucks today cost $450,000, compared to a new comparable diesel truck that costs $150,000." Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it. While these figures are rounded estimates, CARB data supports their range with the *average* price of zero-emission Class 8 day cab being $435,839 versus a comparable diesel at $155, 902. See CARB fact sheet, Zero-Emission Class 8 Truck Pricing Comparisons – EU & US (October 2024). https://ww2.arb.ca.gov/resources/fact-sheets/zero-emission-truck-pricing-comparison-eu-us

i. Do those figures reflect only the initial purchase price of a vehicle? The price of purchasing the vehicle.

ii. Do those figures in your testimony account for long-term fuel and maintenance savings offered by electric trucks? This will vary by location and operation and is not included in the above figures. The cost of infrastructure to support EV chargers is not included either.

iii. Do those figures in your testimony account for any purchase rebates, tax incentives, or other financial supports available to support electric vehicle purchases in Illinois from government entities, electric utilities, or manufacturers themselves? No. As indicated above, not all costs are included either.

c. Do you dispute that total costs of ownership for electric vehicles continue to decrease and that electric freight trucks and buses are expected to be less expensive than combustion engine counterparts by 2027?[3] Obviously we have no data for 2027; however, there is current operational data comparing ICE vehicles to BEVs. While this data reflects energy cost savings and, in some cases, maintenance cost savings, the total cost to transport using BEVs ranges from 3-5% higher when using vans to 94-115%

higher when using Class 8 tractors. We have no reason to assume this data will reverse in less than two years.

i. If so, please provide all data or analysis that supports your position. Please see, "Charged Logistics: The Cost of Electric Vehicle Conversion for U.S. Commercial Fleets" By: Ryder System, Inc., May 2024. https://www.ryder.com/en-us/insights/white-papers/fleet/ev-total-cost-study

ii. Do you dispute the conclusion of the Roush Industries study, cited in the Statement of Reasons, that many electric medium- and heavy-duty vehicles will have a lower total cost of ownership than their diesel counterparts by 2027?[4] See prior response.

iii. Do you dispute the findings of the ICCT, cited in the Statement of Reasons, that, with the benefit of Inflation Reduction Act incentives, the total cost of ownership of electric long-haul trucks will likely be lower than that of their diesel counterparts by the end of the decade?[5] See prior response. In addition, the Energy and Infrastructure Provisions of the Inflation Reduction Act were revoked on January 20, 2025 as part of the Unleashing American Energy Executive Order.

iv. Do you dispute that adoption of the ACT Rule is expected to create economies of scale in electric truck production, driving down costs?[6] If so, on what basis? The previous cited CARB's fact sheet, Zero-Emission Class 8 Truck Pricing Comparisons – EU & US indicates U.S. ZEV prices have increase between 2021 and 2024 when the ACT took effect in California.

d. What specific policies has the Illinois Trucking Association supported to make electric trucks more accessible and affordable for trucking companies? The Illinois Trucking Association supports legislation such as SB 1948, which grants a 2,000-pound weight variance for electric trucks.

15) On page 2, you state that the Proposed Rules would create an uneven playing field and drive businesses and jobs out of Illinois. Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it. My testimony includes multiple sources and data.

a. How does this claim account for the potential growth of businesses and the potential jobs created in the manufacturing, servicing, and charging of electric vehicles that would be supported by a stronger commitment to electric vehicles? I am not sure what you mean by "potential growth of businesses and the potential jobs created". Can you please explain.

b. Are you aware that Illinois is home to electric vehicle manufacturers in addition to retailers? Why did you not address those companies in your testimony? Lion Electric was an electric truck manufacturer in Joliet. They have announced they are closing.

16) On pages 2–3 of your testimony, you state, "[s]tudies from the American Transportation Research Institute show that meeting the same freight demands with electric trucks could require as much as 34.3% more vehicles on the road."

a. Please provide the specific studies underlying that assertion and identify specifically where the 34.3% figure you cite can be found. See prior reference.

b. Have those studies been peer-reviewed? According to ATRI, all their research undergoes rigorous quality assurance protocols including internal and external reviews and validation processes.

c. Is the 34.3% figure based on national data, or is it specific to Illinois? The figure is derived from national operational data reported for tractor-trailers.

d. For the purposes of the 34.3% figure, does the study assume that 100% of trucks would be electrified? No.

e. Do you agree that the American Transportation Research Institute says that its mission is to research "the trucking industry's essential role in a safe, efficient and viable transportation system"? As stated on its website, its mission is to conduct transportation research, with an emphasis on the statement cited above.

f. Do you agree that the American Transportation Research Institute is largely funded by the trucking industry? I am not able to comment on ATRI funding but their website indicates, "ATRI presently manages the U.S. DOT's Freight Mobility Program, and has provided freight mobility and performance measures technical assistance to 31 state DOTs and 11 of the 15 largest MPOs in the U.S. ATRI has received top research awards from ITS America, TIDA, University of Minnesota and the Institute of Transportation Engineers."

17) At page 3 of your testimony, you state, "Transitioning to zero-emission trucks would require a massive investment in infrastructure. Nationally, this transition is projected to cost $1 trillion, with Illinois' share estimated at $36 billion. This equates to an unfunded mandate of nearly $2,800 for every man, woman, and child in Illinois—an unsustainable burden on taxpayers." In support of these statements, you cite the Clean Freight Coalition.

a. Please confirm that the source of these cost estimates is Clean Freight Coalition, Forecasting a Realistic Electricity Infrastructure Buildout for Medium- & Heavy-Duty Battery Electric Vehicles (Mar. 19, 2024), https://www.cleanfreightcoalition.org/sites/default/files/202403/RB%20Study%20Report_f

inal%5B111225%5D.pdf. If you intended to refer to any other sources, please provide them. Yes, and this is the same document that was listed previously.

b. Do you agree that the Clean Freight Coalition report purports to identify the total infrastructure costs associated with electrifying 100% of the U.S. medium- and heavy-duty fleet by 2040? The stated purpose in the report is "to determine the added costs to the freight industry and utilities if commercial vehicles reach 100% electrification."

c. Do you agree that the Clean Freight Coalition report purports to identify infrastructure costs that would be borne by the commercial vehicle industry and utilities, and does not purport to identify any costs that would be borne directly by government or taxpayers? As stated in the report, "a full transition to BEVs would require a substantial and direct expenditure shared by both fleets and utilities, with unknown consequences for the American consumer and ratepayer."

d. What does "unfunded mandate" mean to you? That term was not found in the report, so the context is unclear.

e. The Clean Freight Coalition report does not purport to estimate state-level infrastructure costs. How did you determine that Illinois' share of the report's estimated nationwide costs is $36 billion or "$2,800 for every man, woman, and child in Illinois"? See Exhibit 3

f. Are you aware that the Clean Freight Coalition report has been criticized for having "serious shortcomings in the analysis," which led to cost estimates that are "likely too high by an order of magnitude"? No, I have heard just the opposite.

g. What independent analysis have you undertaken to determine the credibility of the Clean Freight Coalition report on which you rely? The report was authored by Roland Berger, a global management consultancy with expertise in energy & utilities consulting with more than 50 offices around the world.

18) On page 3, you state that the Proposed Rules would "forc[e] a burdensome and punitive regulation on businesses." What do you mean by "punitive"? The proposed regulation will punish companies that choose to stay in Illinois where they will have to purchase expensive electric vehicles with no way to fuel/charge them, while they compete against trucking companies located (or licensed) in other states who can operate less expensive and more reliable vehicles.

19) On page 3, you claim that the Proposed Rule does not have "the necessary support or incentives [for businesses] to achieve compliance." Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that

claim, please provide it. Please refer to the Alternative Fuels Data Center for state-level incentive information.

a. Have you considered how the Proposed Rules would function in the context of the Climate and Equitable Jobs Act? Considering the cost of a Class 8 BEV is roughly $450,000, the current $4,000 rebate which will be reduced to $1,500 in 2028 is unlikely to move the needle with respect to the purchase of these vehicles.

b. Have you considered how the Proposed Rules would function in the context of all the federal, state, local, and private funding already being deployed in Illinois to support charging infrastructure? As noted in the Roland Berger study, the cost of infrastructure is substantial. The level of available funding will not cover these costs. The state must address how and who will pay for this infrastructure.

20) On page 3 of your testimony, you assert that "This Issue Should Be Debated with Public Input."

a. Is your testimony in this proceeding considered public input? I am a trucking industry advocate that was informed about this regulation and this process because of my role.

b. What public input specifically do you believe should be part of debating this issue? We believe public input should include thorough debate, such as is available in the Illinois General Assembly.

c. Do you disagree with the Board's determination that it has the authority to adopt this Proposed Rule? We believe the Pollution Control Board has the authority to adopt rules.

d. Please provide any additional documents, data, or testimony that you feel is missing so that the Board can consider all "health, economic, and environmental impacts" as your testimony mentions on page 3. Please see attached exhibits.

e. Do you dispute that in order to adopt a new regulation of general applicability, the Board must:

i. Hold public hearings in at least two areas (35 Ill. Adm. Code § 102.412)?

ii. Publish notice of the hearings at least 30 days before each hearing (35 Ill. Adm. Code § 102.304)?

iii. Accept written comments from any member of the public (35 Ill. Adm. Code § 102.108)?

iv. Give first notice and accept public comments during the first notice period (35 Ill. Adm. Code § 102.604)?

v. Give second notice to the legislative Joint Committee on Administrative Rules and respond to any objections or suggestions from JCAR (35 Ill. Adm. Code § 102.606)?

vi. Give notice of its final action to all persons on the notice list (35 Ill. Adm. Code § 102.608)?

vii. Satisfy all other applicable provisions of the Board's rules and the Illinois Administrative Procedure Act relating to public participation? I do not dispute the Illinois Administrative Code.

f. Do you contend that the Board has failed to comply with any applicable provisions relating to public participation in this proceeding? I think the Board has done a good job.

g. Do you disagree with the Illinois General Assembly's determination in the Administrative Procedure Act and the Illinois Environmental Protection Act that the procedural requirements to which the Board is subject provide sufficient public participation to justify the exercise of the Board's rulemaking authority? I think that the Board has done a good job.

h. You assert that the General Assembly's legislative process ensures "Executive Oversight."

i. Do you believe that the Governor has "oversight" authority over the legislature? The Governor has the ability to veto legislation.

ii. Are you aware that Pollution Control Board members are appointed by the Governor? I am aware that the Pollution Control Board members are appointed by the Governor.

21) On page 3 of your testimony, you write, "The Trucking Industry Has Already Made Significant Environmental Progress and Incentives (Not Mandates) Are Working."

a. Please identify all of the incentives that you believe are "working." DERA, HVIP, FET repeal.

b. How do you define "working" as you use it in this assertion? Allows the purchase and deployment of vehicles which are available to purchase and meet the operational needs of each fleet without incurring cost penalties over current operations.

c. Please specify which "mandates" you believe are not "working." As evidenced from recent delays in Massachusetts and Oregon, the Low-NOx Omnibus regulation is currently not implementable.

> On Nov. 21, 2024, the Environmental Quality Commission adopted a temporary rule to pause implementation of the Low NOx Omnibus Rule until

> 2026. This pause was adopted to avoid severe restrictions in the supply of new vehicles, based on manufacturer business decisions.

https://www.oregon.gov/deq/aq/Documents/HDOFAQ.pdf

Recent information from several other states raises significant concerns over the feasibility of ACT.

> Sean Waters, vice president of product integrity for Daimler Truck North America, pointed out that despite having a 40% share of Class 8 vehicles, the manufacturer has sold only three electric trucks in the past three years. It therefore can sell only 39 diesel trucks in Washington, Due to Advanced Clean Trucks rules.

https://landline.media/stakeholders-weigh-in-on-bill-to-repeal-california-vehicle-emission-standards-in-washington-state/

In addition, recent bankruptcies among start-up EV truck manufacturers have raised further concerns regarding the viability of EV mandates.

> Nikola is not the first EV startup to have filed for bankruptcy from that lot. Last month, Canoo (GOEVQ) also filed for bankruptcy. The ever-growing list includes Arrival (ARVLF), Bird Global (BRDSQ), Lion Electric, Lordstown Motors, Lightning eMotors, Electric Last Mile Solutions (ELMSQ), Volta Trucks, and Proterra. This list is not exhaustive, and several other companies in the green energy ecosystem have gone out of business.

https://www.barchart.com/story/news/31083125/nikola-just-filed-for-bankruptcy-which-ev-stock-will-be-next

d. How does the trucking industry propose to achieve Governor Pritzker's pledge to make the state's on-road vehicles emission-free by 2050? The ITA continues to support the development of zero-emission vehicles in circumstances where they work and make sense. Time is needed for this technology and infrastructure to develop. Establishing unachievable timeframes rather than giving this technology a chance to mature will not yield the desired outcome.

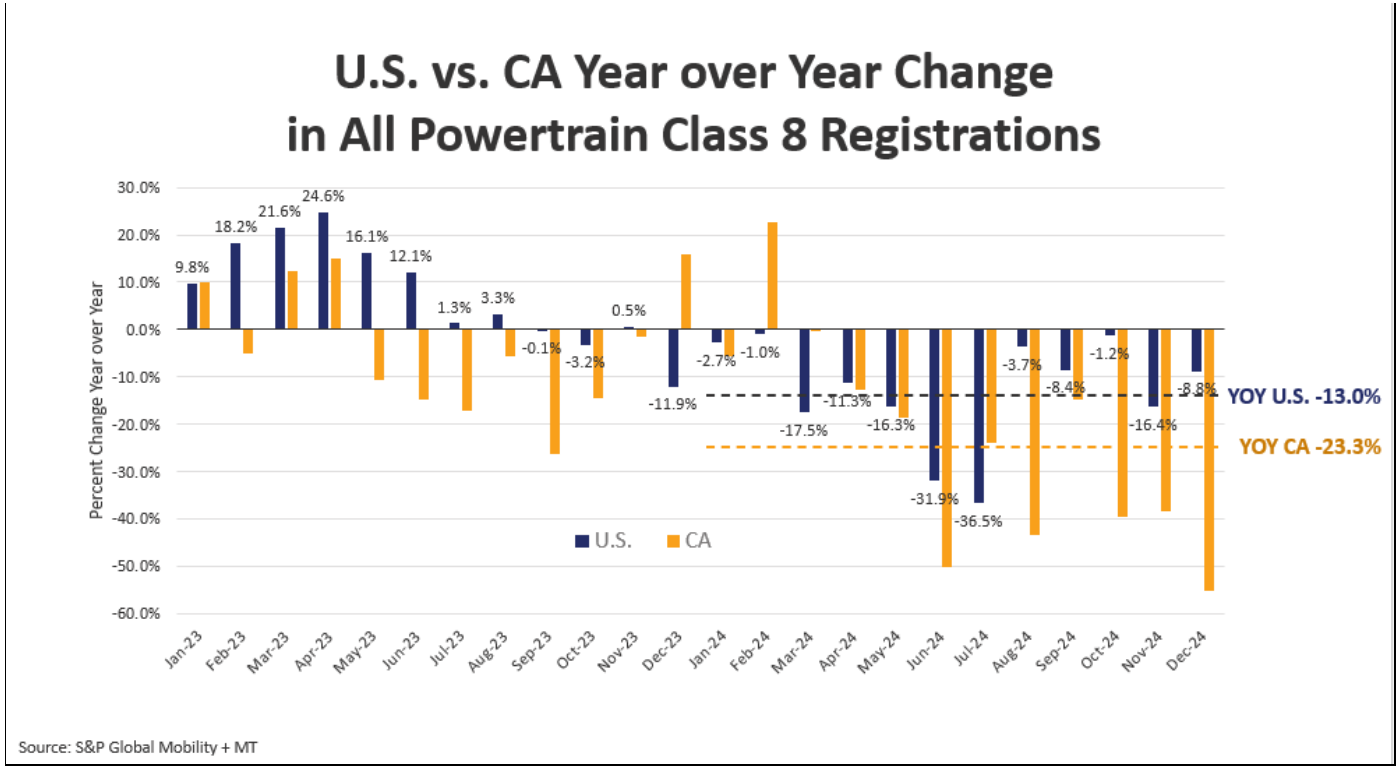
e. On page 3 of your testimony, you state: "[W]e have reduced particulate matter (PM) and nitrogen oxide (NOx) emissions by more than 98%." Your testimony cites no data or sources to support this claim, correct? If you did rely on any data or information as the basis for that claim, please provide it. Reference is based on U.S. EPA engine emission standards from 1973 to now compared to emission levels prior to regulations.

22) Has the Illinois Trucking Association done any studies to assess levels of respiratory health issues among its membership? Not our area of expertise.

Exhibit 1:

Illinois New Registrations		Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Totals	% EVs
Class 3	**All**	1,208	897	991	1,091	1,179	819	703	1,417	987	1,013	1,393	11,698	
	EVs	25	15	13	17	7	8	6	20	3	17	22	153	1.3%
Class 4	**All**	213	174	165	152	234	122	113	311	184	271	156	2,095	
	EVs	0	0	0	0	0	0	0	0	0	0	0	0	0.0%
Class 5	**All**	159	198	188	233	233	195	142	221	220	176	235	2,200	
	EVs	0	0	0	0	0	0	0	0	0	0	0	0	0.0%
Class 6	**All**	186	222	256	278	312	240	152	249	187	196	185	2,463	
	EVs	0	0	0	0	2	0	0	0	0	0	0	2	0.1%
Class 7	**All**	219	150	105	68	93	66	249	580	276	348	184	2,338	
	EVs	13	2	4	2	0	0	0	6	0	20	24	71	3.0%
Class 8	**All**	1,251	1,414	2,141	1,307	1,495	1,074	1,580	2,363	1,542	1,896	1,261	17,324	
	EVs	1	0	8	0	0	0	0	1	34	1	1	46	0.3%
All Classes	**All**	3,236	3,055	3,846	3,129	3,546	2,516	2,939	5,141	3,396	3,900	3,414	38,118	
	EVs	39	17	25	19	9	8	6	27	37	38	47	272	0.71%
Source: ATD/S&P														

Exhibit 2:


U.S. vs. CA Year over Year Change
in All Powertrain Class 8 Registrations
Percent Change Year over Year
30.0%
20.0%
10.0%
0.0%
-10.0%
-20.0%
-30.0%
-40.0%
-50.0%
-60.0%
9.8%
18.2%
21.6%
24.6%
16.1%
12.1%
1.3%
3.3%
-0.1%
-3.2%
0.5%
-11.9%
-2.7%
-1.0%
-17.5%
-11.3%
-16.3%
-31.9%
-36.5%
-3.7%
-8.4%
-1.2%
-16.4%
-8.8%
YOY U.S. -13.0%
YOY CA -23.3%
U.S.
CA
Jan-23
Feb-23
Mar-23
Apr-23
May-23
Jun-23
Jul-23
Aug-23
Sep-23
Oct-23
Nov-23
Dec-23
Jan-24
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Mar-24
Apr-24
May-24
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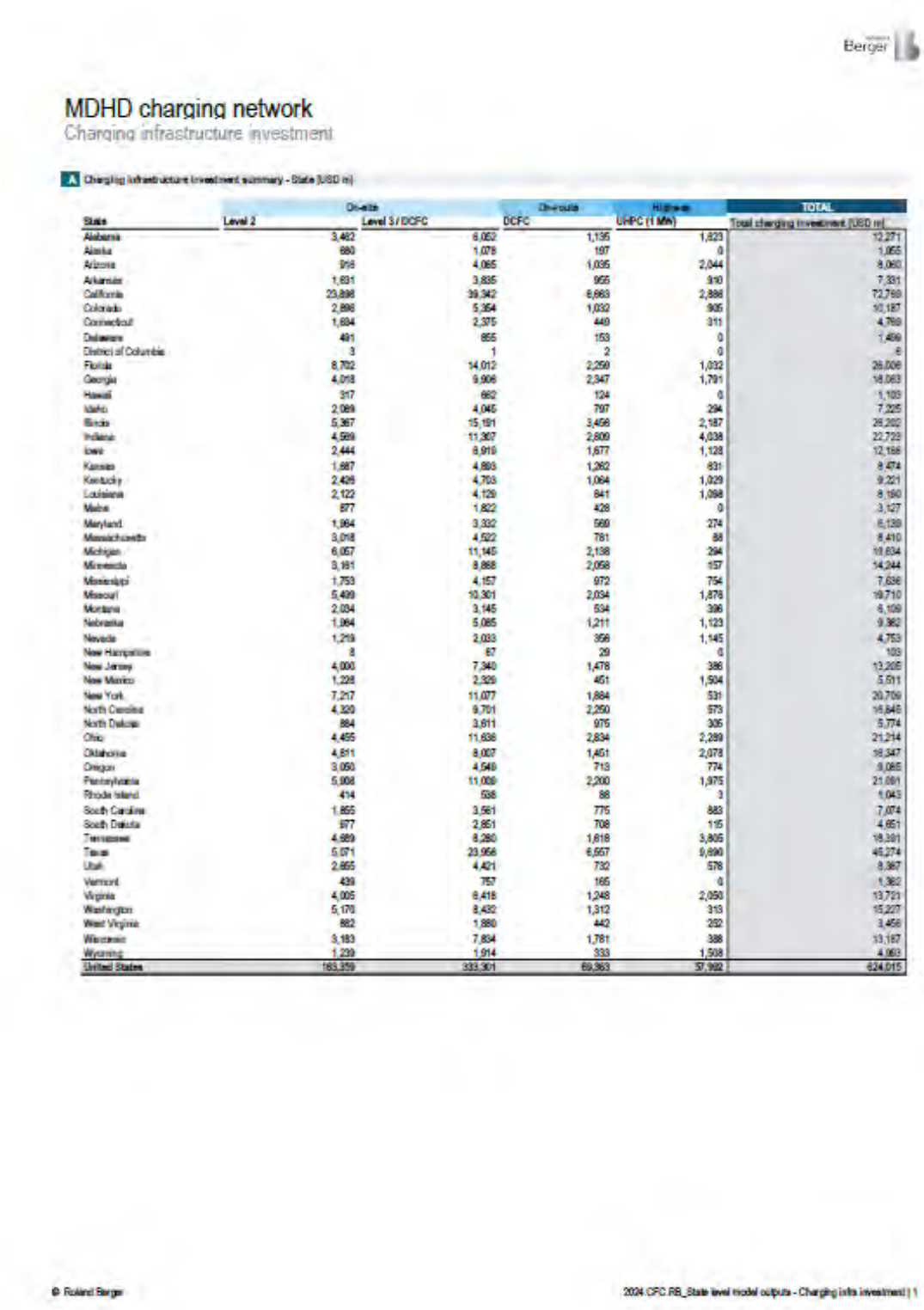
Jul-24
Aug-24
Sep-24
Oct-24
Nov-24
Dec-24
Source: S&P Global Mobility + MT

Exhibit 3:



Berger

MDHD charging network

Charging infrastructure investment

A Charging infrastructure investment summary - State [USD m]

State	On-site		On-route	Highway	TOTAL
	Level 2	Level 3 / DCFC	DCFC	UHPC (1 MW)	Total charging investment [USD m]
Alabama	3,462	6,052	1,135	1,623	12,271
Alaska	680	1,078	197	0	1,955
Arizona	916	4,065	1,035	2,044	8,060
Arkansas	1,831	3,835	955	910	7,331
California	23,898	39,342	6,663	2,888	72,790
Colorado	2,898	5,354	1,032	905	10,187
Connecticut	1,694	2,375	449	311	4,769
Delaware	491	855	153	0	1,499
District of Columbia	3	1	2	0	6
Florida	8,702	14,012	2,259	1,032	26,006
Georgia	4,018	9,906	2,347	1,791	18,063
Hawaii	317	662	124	0	1,103
Idaho	2,089	4,045	797	294	7,225
Illinois	5,367	15,191	3,456	2,187	26,202
Indiana	4,599	11,307	2,809	4,038	22,723
Iowa	2,444	8,919	1,677	1,128	12,168
Kansas	1,687	4,893	1,262	631	8,474
Kentucky	2,426	4,703	1,064	1,029	9,221
Louisiana	2,122	4,129	841	1,098	8,190
Maine	877	1,822	428	0	3,127
Maryland	1,964	3,332	569	274	6,139
Massachusetts	3,018	4,522	781	88	8,410
Michigan	6,057	11,145	2,138	294	19,634
Minnesota	3,161	8,868	2,058	157	14,244
Mississippi	1,753	4,157	972	754	7,636
Missouri	5,499	10,301	2,034	1,876	19,710
Montana	2,034	3,145	534	396	6,109
Nebraska	1,964	5,085	1,211	1,123	9,382
Nevada	1,219	2,033	356	1,145	4,753
New Hampshire	8	67	29	0	103
New Jersey	4,000	7,340	1,478	386	13,205
New Mexico	1,228	2,326	451	1,504	5,511
New York	7,217	11,077	1,884	531	20,709
North Carolina	4,320	9,701	2,250	573	16,845
North Dakota	884	3,611	975	305	5,774
Ohio	4,455	11,636	2,834	2,289	21,214
Oklahoma	4,811	8,007	1,451	2,078	16,347
Oregon	3,050	4,549	713	774	9,085
Pennsylvania	5,908	11,009	2,200	1,975	21,091
Rhode Island	414	536	88	3	1,043
South Carolina	1,855	3,561	775	883	7,074
South Dakota	977	2,851	708	115	4,651
Tennessee	4,689	8,280	1,618	3,805	18,391
Texas	5,071	23,956	6,557	9,690	45,274
Utah	2,855	4,421	732	578	8,387
Vermont	439	757	165	0	1,362
Virginia	4,005	8,418	1,248	2,050	13,721
Washington	5,170	8,432	1,312	313	15,227
West Virginia	882	1,880	442	252	3,456
Wisconsin	3,183	7,894	1,781	388	13,187
Wyoming	1,239	1,914	333	1,508	4,993
United States	183,359	333,301	69,363	57,992	624,015

MDHD charging network

Electric grid investment

B Distribution grid investment summary - State [USD m]

State	Total distribution investment [USD m]
Alabama	14,463
Alaska	6,243
Arizona	1,090
Arkansas	6,997
California	25,444
Colorado	3,760
Connecticut	1,718
Delaware	472
District of Columbia	1
Florida	6,623
Georgia	10,515
Hawaii	193
Idaho	5,336
Illinois	10,547
Indiana	41,625
Iowa	10,051
Kansas	5,362
Kentucky	10,597
Louisiana	5,018
Maine	2,477
Maryland	1,734
Massachusetts	2,754
Michigan	16,900
Minnesota	8,231
Mississippi	11,584
Missouri	13,035
Montana	2,215
Nebraska	5,981
Nevada	1,061
New Hampshire	21
New Jersey	2,992
New Mexico	992
New York	6,298
North Carolina	12,724
North Dakota	3,969
Ohio	15,307
Oklahoma	7,521
Oregon	4,753
Pennsylvania	9,710
Rhode Island	415
South Carolina	5,778
South Dakota	3,440
Tennessee	11,337
Texas	10,013
Utah	5,561
Vermont	554
Virginia	7,610
Washington	9,126
West Virginia	2,165
Wisconsin	15,070
Wyoming	1,175
United States	368,657

Motor Carrier Management Information System (MCMIS) Snapshot Date: 01/31/2025

Select View	Select Count by	Domicile Country	Service Center	Domicile State	Carrier Operation	Operation Class	Carrier Type	Fleet Size	Driver Size
Table	# of Carriers	All	All	Illinois	All	All	All	All	All

49,429 # of Carriers

375,727 # of Drivers

359,961 # of Vehicles

of Carriers by Domicile Country & State

Domicile Country	Domicile State	
Grand Total		49,429
United States	Illinois	49,429

of Carriers by Carrier Population by Snapshot Date

Jan 2025	49,429
Dec 2024	49,350
Dec 2023	48,908
Dec 2022	48,212
Dec 2021	44,834

of Carriers by Carrier Operation

Interstate	34,818
Intrastate Hazmat	490
Intrastate Non-Hazmat	14,121

of Carriers by Operation Classification

For Hire	31,361
Private	13,764
Both	4,099
Other	205

of Carriers by Carrier Type

Freight	48,907
Hazmat	371
HM Safety Permit	24
Passenger	522
Motorcoach	51
HHG	190

of Carriers by Fleet Size

1	24,417
2	8,295
3 - 10	10,971
11 - 100	4,021
>100	421
No Power Units/Unreported	1,304

of Newly Registered Carriers

2025	465
2024	4,757
2023	3,976
2022	4,140
2021	4,328
2020	2,784
2019	1,981

of Carriers by Driver Size

1	23,003
2	9,334
3 - 10	12,211
11 - 100	3,985
>100	474
No Drivers/Unreported	422

Displaying # of Carriers that meet the following criteria, as of 01/31/2025
Domicile Country: All | **Service Center:** All | **Domicile State:** Illinois | **Operation Type:** All | **Operation Classification:** All | **Carrier Type:** All | **Fleet Size (Power units):** All | **Driver Size:** All

Advanced Filters Applied :

RUN DATE 01/17/2025 VEHICLE SERVICES DEPARTMENT PAGE 9
ALL ACTIVE REGISTRATIONS BASED ON EXPIRATION DATE JAN 2025 FORWARD

PLATE		ACTIVE COUNTS
MULTI-YEAR FISCAL		
B	TRUCK	1,278,281
C	TRUCK	64,587
TA	TRAILER	313,048
UT	TRAILER	13
	SUB TOTALS	1,655,929
ANNUAL FISCAL TRUCKS		
D		92,825
F		43,514
H		40,213
J		1,504
K		2,905
L		5,017
N		525
P		464
Q		1,837
R		9,700
S		1,117
T		1,157
V		5,065
X		121
Z		10,124
	SUB TOTALS	216,088

Illinois

TRUCKING FAST FACTS

TRUCKING DRIVES THE ECONOMY

CAREERS

339,210 Trucking industry jobs in Illinois

1 in 15 jobs in the state

SMALL BUSINESS EMPHASIS

47,590 Trucking companies located in Illinois

Primarily small, locally owned businesses, these companies are served by a wide range of supporting businesses.

COMPETITIVE WAGES

Total trucking industry wages paid in Illinois in 2023 exceeded **$20.7 billion**, with an average annual trucking industry salary of **$60,929**.

Heavy and tractor-trailer truck drivers held **85,670** jobs in Illinois in 2023. The national average annual salary of an over-the-road truck driver is **$75,144**.

TRANSPORTING THE ESSENTIALS

95.3% of manufactured tonnage transported by trucks in Illinois.

716,900 tons per day

70.2% of communities in the state depend exclusively on trucks to move their goods.

SAFETY MATTERS

SAFETY FIRST

Illinois Trucking Association members put safety first through:

- ✓ Improved driver training
- ✓ Investment in advanced safety technologies
- ✓ Active participation in industry safety initiatives

ATRI research shows the success of their efforts. Members of State Trucking Associations are involved in fewer crashes and receive fewer violations at roadside inspections than their industry peers.

Crashes per 100 Million Miles by STA Membership Status:

CURRENT MEMBERS	95.10
FORMER MEMBERS	121.21
NEVER MEMBERS	146.33

CONTINUALLY IMPROVING

2022 U.S. fatal crash rate: USA: 1.59 / Illinois: 1.61

per 100 million Vehicle Miles Traveled (VMT)

Between 1975 and 2022, the U.S. large truck fatal crash rate has dropped **65.3%**

COMMITMENT TO SHARING THE ROAD

The **Share the Road** program sends a team of professional truck drivers to communities around the country to teach car drivers about truck blind spots, stopping distances and how to merge safely around large trucks.

ATRI American Transportation Research Institute

ILLINOIS TRUCKING ASSOCIATION

www iltrucking.org

@iltrucking

Updated January 2025 with most recent data available

Illinois

TRUCKING FAST FACTS

TRUCKING PAYS THE FREIGHT

THE INDUSTRY

The trucking industry in Illinois paid approximately **$1.8 billion** in federal and state roadway taxes

The industry paid **33%** of all taxes owed by Illinois motorists ...

... despite trucks representing only **12%** of vehicle miles traveled in the state.

INDIVIDUAL COMPANIES

As of January 2025, a typical five-axle tractor-semitrailer combination paid highway user fees and taxes of ...

STATE **$15,002**

FEDERAL **$10,556**

These taxes were over and above the typical taxes paid by businesses in Illinois.

ROADWAY USE

146,010

Miles of public roads in Illinois

Miles driven on public roads:

All Motorists: **103.8 billion**

Trucks: **12.1 billion**

Traffic congestion in Illinois cost the trucking industry **$4.3 billion** in 2022.

DELIVERING A CLEANER TOMORROW

EMISSIONS

65% of Illinois commercial trucks are now powered by the newest-generation, **near-zero emissions** diesel technology.

Medium- and heavy-duty trucks contribute just **23%** of all transportation-related greenhouse gas (GHG) emissions in the U.S. and represent only **6%** of total U.S. GHG emissions.

FUEL CONSUMPTION

The trucking industry continues to improve energy and environmental efficiency even while increasing the number of miles driven. In 2022:

- ✓ Combination trucks accounted for just **16%** of the total highway transportation fuel consumed.
- ✓ Combination trucks consumed nearly **116 billion** fewer gallons of fuel than passenger vehicles in the U.S.

PARTNERSHIPS

Through the **U.S. Environmental Protection Agency's (EPA) SmartWay Transport Partnership**, the trucking industry is working with government and businesses to quantify greenhouse gas emissions and take steps to reduce them.

ATRI American Transportation Research Institute

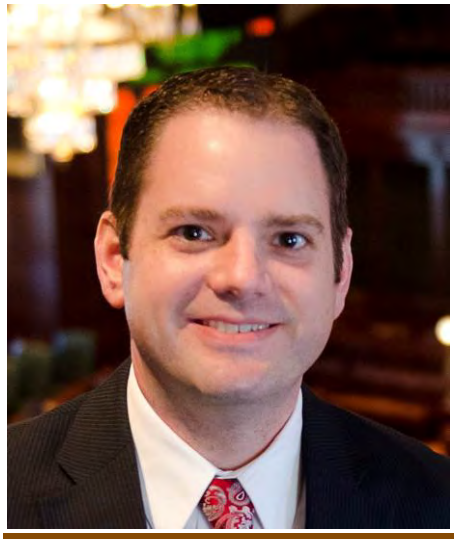
ILLINOIS TRUCKING ASSOCIATION

iltrucking.org

@iltrucking

Updated January 2025 with most recent data available

The following data sources were utilized for the Fast Facts: *United States Bureau of Labor Statistics (2023); Federal Motor Carrier Safety Administration: Analysis & Information (2024); American Trucking Associations Driver Compensation Study (2024); Commodity Flow Survey Public Use Microdataset (2017); American Transportation Research Institute: Membership Counts - Associations with Safety (2023); Federal Highway Administration: Highway Statistics Series (2022); National Highway Traffic Safety Administration: Fatality and Injury Reporting System Tool (2022); Energy Information Administration: Fuel Taxes (2024); International Fuel Tax Association: Fuel Tax Rates (Q4 2024); International Registration Plan, Inc.: Jurisdiction Data (2025); American Transportation Research Institute: Cost of Congestion to the Trucking Industry (2024); Diesel Technology Forum Clean Diesel Powers in Your State (2023); Environmental Protection Agency Fast Facts on Transportation Greenhouse Gas Emissions (2022).*



MATTHEW HART

EXECUTIVE DIRECTOR

OBJECTIVE

To lead with passion and purpose, building great people and great organizations.

SKILLS & ABILITIES

Proven leader with a desire to help trucking companies succeed.

CONTACT

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Springfield, IL 62704

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or

2250 S Chicago St, Ste 201

Joliet, IL 60436

T 630.654.0884

E matt@iltrucking.org

EXPERIENCE

ILLINOIS TRUCKING ASSOCIATION
SPRINGFIELD AND JOLIET, IL

2011 - PRESENT

Serve as Executive Director of a non-profit, membership-based organization while also providing legislative representation and regulatory guidance to the transportation industry. I have 20 years of experience as a trucking industry advocate.

ILLINOIS MOVERS' AND WAREHOUSEMEN'S ASSOCIATION, SPRINGFIELD, IL

2018 – PRESENT

Through a management agreement, I also serve as Executive Director of IMAWA providing legislative representation and regulatory guidance to moving and warehousing company owners.

EDUCATION

UNIVERSITY OF ILLINOIS, URBANA-CHAMPAIGN, BACHELOR OF FINANCE

COMMUNICATION

Hosted Dozens of Professional Webinars. Testified in State House and State Senate Hearings. Spoken at Various State and National Meetings Including Intermodal Association of North America, American Trucking Associations, Transportation Lawyers Association, National Tank Truck Carriers, and Northwestern University Transportation Center.

LEADERSHIP

Past Board Member & Past Chairman of BIFEC, a coalition of business organizations; Current Treasurer (Past Chairman) of Trucking Association Executives Council, Midwest Region.