

R24-17

Proposed Clean Car and Truck Standards: Proposed 35 Ill. Adm. Code 242

Question Directed to All Witnesses

1. On February, 6, 2025, Commonwealth Edison (ComEd) announced \$100 million in new rebates designed to boost electric vehicle (EV) fleet purchases and charging stations across northern Illinois. The rebate program is discussed in a February 11, 2025 Canary Media article, titled "Illinois' largest utility unveils \$100M to spur EV adoption". The Board takes notice of this article, attached hereto as Attachment B, under Section 101.630 of the Board's procedural rules. See 35 Ill. Adm. Code 101.630. As discussed in the Canary Media article, ComEd's program helps meet the mandate for the State's CEJA [Climate and Equitable Jobs Act], which calls for 1 million EVs on the roads by 2030. Of the \$100 million, \$53 million is available for business and public-sector EV fleet purchases, \$38 million is designed to upgrade infrastructure for non-residential charger installations, and nearly \$9 million is intended for residential charging stations. This money is in addition to \$87 million announced last year for similar incentives.

Participants have noted the shortfall of money and infrastructure needed to make 100% zero-emission vehicle (ZEV) sales by 2050 a reality. However, as the ComEd announcement purports, there are non-governmental entities that are already contributing toward the needed infrastructure and financing. Is it Participants' position that market forces and other rebate and incentive programs would not contribute significantly to the ZEV mandate requirements of the proposed rule? If so, why?

We believe rebate and incentive programs such as the ComEd program would not contribute significantly to the ZEV mandate requirements of the proposed rule for the trucking industry in Illinois.

While car charging infrastructure has been building across the country for more than a decade, truck charging infrastructure is nearly nonexistent: because electric truck manufacturing is nearly nonexistent. In fact, electric truck manufacturers are closing.

There are zero public truck charging stations anywhere in the country. Zero.

Even in California, where they have been preparing for these ZEV mandate requirements since 2021, there are zero public truck charging stations.

In addition, truck charging infrastructure is much, much more expensive than car charging infrastructure. The \$53 million noted above for business and public-sector EV fleet purchases would be enough money to purchase a total of 121 Class 8 trucks. According to the Illinois Secretary of State, there are 29,585 Class 8 Fiscal Plate (i.e., In-State Only) trucks registered in Illinois. Even if ComEd gave us \$53 million every year, it would take 244 years to replace the In-State Only trucks.

The \$38 million designed to upgrade infrastructure would be enough money to purchase a total of 340 truck chargers.

From: [Matt Hart](#)
To: [Brown, Don](#); [Horton, Vanessa](#); [Leoni, Carlie M.](#)
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Subject: [External] R24-17 / Question Directed to All Witnesses
Date: Monday, March 3, 2025 9:52:48 PM
Attachments: [image001.png](#)
[Illinois Trucking Association Response to All Witnesses Question.pdf](#)

Dear Don,

After submitting our response to the prefiled questions this afternoon, I noticed that I forgot to respond to the "Question Directed to All Witnesses".

Please see the attached for our response to the PCB Question Directed to All Witnesses.

I know that today was the deadline for answers to questions. If it is too late, I can bring this to the hearing next week.

Thank you,

Matthew W. Hart
Executive Director

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