



March 11, 2025

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 (EC) is writing today in support of the Advanced Clean Truck standard (ACT rule), which would require manufacturers of medium- and heavy-duty vehicles (MHDVs) 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.

U.S. auto manufacturers are mid-transition to electrifying their portfolios to stay competitive, both at-home and abroad. However, China currently dominates the entire EV supply chain, from critical minerals and battery production to new and competitively priced electric vehicles. It is imperative that there is policy support at the state, local, and federal level for our growing EV industry in this transition.

1. The Illinois Pollution Control Board submitted questions last month regarding the government and market conditions, and the ability to meet the proposed goals by 2050. The Electrification Coalition believes that the prevailing government and market forces are, and will continue, to be a significant contribution towards these goals. 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, including **\$39 million** from the Driving a Cleaner Illinois Program.
2. 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.



Specifically,

- a. Illinois Environmental Protection Agency (IEPA) is the recipient of a Climate Pollution Reduction Grant awarding the IEPA 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,
- b. 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,
- c. 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,
- d. Utilities like Commonwealth Edison are also stepping up – and recognizing the electrification opportunity – by announcing a combined **\$187 million** in rebates and incentives for EVs, EV charging stations, and grid infrastructure upgrades,
- e. The opportunity and market conditions in Illinois have attracted nearly \$11 billion in private investment in the EV manufacturing and supply chain.

With some uncertainty around the availability of federal funding, it is more important than ever that Illinois lead in developing a comprehensive and holistic policy strategy to assist in the transition of the entire medium- and heavy-duty sector towards electrification.

As a complementary policy to incentives and investments, the ACT rule is designed to reduce costs of zero-emission MHDVs by requiring manufacturers to increase volume and 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, along with the prevailing government and market forces supporting increased investment across Illinois, will enable cost-effective electrification of the medium- and heavy-duty vehicle sector 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 ACT 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 across the entire EV supply chain in Illinois. 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 the Illinois Pollution Control Board to support Illinois' adoption of ACT.

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



Electrification
Coalition

111 19th Street, NW
Suite 406
Washington, DC 20036
TEL 202-448-9300

electrificationcoalition.org

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Anne Blair

Vice President, Policy & Freight | Electrification Coalition

ablair@electrificationcoalition.org