



900 N. 69th Street | Kansas City, Kansas | 66102

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,

Orange EV appreciates the opportunity to comment on the *Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242 (Case #: R2024-017)*. We strongly support the proposal and urge the Illinois Pollution Control Board (IPCB) to approve it. The long-term health of America's citizens, including residents of Illinois, depends on states implementing measures that reduce emissions from the transportation sector.

Regulatory proposals like this provide ambitious but achievable targets that will significantly improve air quality statewide by providing frameworks for future sales and assurances. This allows truck manufacturers to plan effectively for future growth in an industry that has – at its core – a mission to benefit the health and wellness of all Americans.

Orange EV in Illinois

Orange EV is the industry-leading manufacturer of Class 8 battery-electric terminal trucks. Formed in 2012, we commercially deployed our first truck in Chicago at a DHL Supply Chain site in 2015. Today we are pleased to report that this **first truck** is still going strong more than 9 years later and DHL Supply Chain now has 100 Orange EV trucks deployed across America – ten of which are currently operating in Illinois. Those all electric terminal trucks join the over 1,400 Orange EV trucks working nationwide in 40 states, along with Canada and the Caribbean, cumulatively having surpassed 21.5 million miles and 7.9 million hours of operation.

Today there are 53 Orange EV terminal trucks deployed in Illinois. From Chicagoland to the Quad Cities to Edwardsville and points between, Orange EV terminal trucks operate in rail yards, and in logistics operations serving national grocery chains, big box stores, and a host of other businesses. Like all successful businesses, these customers are focused on their bottom lines, making decisions that make the most financial sense. Orange EV trucks cost less to operate, average more than 98% uptime, and can haul up to 180,000 lbs; they are also cooler, smoother, cleaner, and quieter than their diesel-fueled counterparts, making them preferred equipment for drivers where-ever they are deployed. The fact that



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they are electric means that they are not just better trucks, but that they are better trucks with zero tailpipe emissions that protect the health and safety of drivers, other employees, and residents in communities adjacent to those deployments.

Why Adopt an Advanced Clean Trucks Rule

Orange EV strongly supports the Advanced Clean Trucks (ACT) regulation for several reasons.

Good Jobs

ACT regulations allow original equipment manufacturers (OEMs) like Orange EV to make secure training investments that grow employment numbers. As demand for our trucks increases, we hire field service technicians and others to support our mission, a trend that will certainly continue with the implementation of Illinois' ACT. Moreover, as the number of industrial deployments grows with implementation of the ACT, ZEV-related services in adjacent verticals will also need to expand statewide. For example, new jobs will also be created by those servicing alternative fuel vehicles, installing charging infrastructure, and undertaking long-term technological development. Orange EV, for example, has increased our Illinois employment numbers by over 33% in the last five years, a number that will surely grow exponentially in our own labor force, and those of other OEMs and businesses that provide high-paying jobs supporting the growth of Illinois infrastructure.

Better Health

Rules like the ACT result in healthier workers and communities. Research shows that low-speed diesel-powered terminal trucks may generate "...NO_x emissions of more than 5-times the certification limit for the average heavy-duty vehicle."¹ This not only threatens the health and safety of those driving and working in yards where such trucks run, but also the quality of life for those living adjacent to such facilities as atmospheric conditions spread emissions beyond walls and fences. ACT rules help mitigate against damage to the health of especially vulnerable communities across Illinois as research "results show that warehouses are disproportionately located in both low-income and medium-income minority neighborhoods."² By adopting the ACT, the Illinois Pollution Control Board demonstrate its support for policies that improve air quality, particularly for frontline

¹ Badshah, Huzeifa, Francisco Posada and Rachel Muncrief. "Current State of NO_x Emissions from In-Use Heavy-Duty Diesel Vehicles in the United States." *White Paper*. The International Council on Clean Transportation. 1991.

² Quan, Yuan. "Location of Warehouses and Environmental Justice." *Journal of Planning Education and Research*. July 19, 2018. (<https://doi.org/10.1177%2F0739456X18786392>)



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communities near freight hubs and for the employees and laborers working around polluting vehicles every day.

Secure Investment

Rules like the ACT provide OEMs and those operating in adjacent businesses verticals clear policy directions; in turn, this allows us to make informed decisions about production, fleet turnover, infrastructure investments, and workforce training which, in turn, helps businesses decrease costs. Moreover, businesses that purchase from OEMs like Orange EV benefit financially when ACT rules are implemented. The increased availability of clean-fuel vehicle models reduces costs across all models. Lower purchase prices, fuel savings, and reduced maintenance expenses are just some of the cost-savings customers can rely on. And, of course, the availability of more models prevents uncertainty in the market, which can hinder innovation.

Practical and Possible

The ACT has proven to be a practical way to encourage medium and heavy duty (MHD) electric vehicle deployments and compliance in early-adoption states like California and Oregon. As evidenced by the Global Commercial Vehicle Drive to Zero ZETI Data Explorer, the industry is well-prepared to address business needs with many different MHD EV models that can meet fleet requirements nationwide.³ Furthermore, early credit provisions help manufacturers build credit banks, accelerating EV sales. Developed with input from stakeholders across Illinois' communities, including vehicle manufacturers, the ACT sets ambitious yet cost-effective goals, with sales requirements increasing over time and varying by vehicle class.

Advanced Clean Trucks programs like those included in the *Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242 (Case #: R2024-017)* will help Illinois secure well-paying jobs, reduce pollution and improve public health among workers and throughout the greater community, and bring great benefit to businesses statewide. The program is practical and Orange EV urges the Illinois Pollution Control Board to recommend its implementation statewide.

³ The *Global Commercial Drive To Zero Program — Zero-Emission Technology Inventory (ZETI)* can be found online at <https://globaldrivetozero.org/tools/zeti>.

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Subject: [External] Orange EV Public Comments to the Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242 (Case #: R2024-017)
Date: Wednesday, April 16, 2025 8:50:19 AM
Attachments: [Orange EV Public Comment Proposed Clean Car and Truck Standards Proposed Section 35 Ill. Admin. Code 242 Case R2024-017.pdf](#)

Dear Mr. Brown,

Attached, please find Orange EV's public comments for submission in support of Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242 (Case #: R2024-017).

Please let me know if any additional information or reformatting is required for your acceptance.

Thank you for your assistance in this matter.

Respectfully,

Terry Manies

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