



Dec. 2, 2024

RE: R2024-017PC In the Matter of: Proposed Clean Car and Truck Standards: Proposed Section 35 Ill. Admin. Code 242 Illinois Department of Transportation

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

Thank you for considering this testimony in strong support of the proposal to adopt Advanced Clean Trucks (ACT) and Advanced Clean Cars II (ACC II).

I submit this testimony on behalf of Ceres, a sustainability advocacy organization that works with some of the largest businesses and investors in Illinois and across the country to build a clean energy future and a more sustainable global economy.

Ceres organizes multiple influential business networks, including the [Business for Innovative Climate and Energy Policy](#) (BICEP) network – a coalition of more than 80 companies committed to supporting policies that prioritize clean energy technologies, and the [Corporate Electric Vehicle Alliance](#) (CEVA) – a collaborative group of 35 companies focused on transitioning to zero-emission vehicles (ZEVs).

Businesses across our networks have decided to electrify their on-road fleet and networked vehicles to capture operational cost savings, meet emissions and air quality goals, and support the health of their communities, customers, and employees. The Corporate Electric Vehicle Alliance alone currently represents robust demand for ZEVs, with members planning to procure approximately [330,000](#) as soon as 2026, under a supportive market environment.

While the availability of commercial ZEVs in the U.S. market has improved, major fleet operators still face difficulties in procuring the ZEVs—in terms of both unit volume and model configuration—that they need to meet their ambitious climate and sustainability goals. ACT and ACC II's gradually increasing manufacturer sales requirements, which ramp up until 2035 to between 40% and 75% for ACT and 100% for ACC II, give manufacturers the certainty they need to invest in producing the volume and variety of ZEVs needed to meet different industry needs. They can also help reduce the upfront cost of ZEVs by supporting economies of scale.

In recognition of ACT and ACC II's benefits, dozens of companies have joined Ceres in supporting the rule's adoption in Illinois. In 2023, Ceres [sent a letter to Governor Pritzker on behalf of CEVA](#) outlining the Alliance's support for the adoption of ACT and ACC II by



additional states, including Illinois. At the same time, we also submitted two business sign-on letters supporting adoption of the ACT and ACC II rules, respectively. The [ACT letter](#) was signed by over 85 companies, investors, and employers, while the [ACC II letter](#) was signed by 52, including many with operations or business interests in Illinois.

Since the original submission of these letters, the need for policy support has not been resolved. Therefore, we encourage the Illinois Pollution Control Board to take this opportunity to move forward with adoption of the ACT and ACC II rules, which will help ensure that the state's business community can access a range of affordable and practical ZEV models that meet diverse operational needs.

Sincerely,

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