



PARTNERS FOR A ZERO EMISSION VEHICLE FUTURE

California's Advanced Clean Trucks Rule

Partners for a Zero Emission Vehicle Future (PZEVF) believes zero emission vehicles (ZEVs) are the future of heavy-duty transportation.

We support states' pursuit of air quality and emissions goals by accelerating the ZEV transition. However, state-by-state adoption of California's Advanced Clean Trucks (ACT) rule without the implementation of supporting policies such as sales incentives and robust infrastructure investments will hinder ZEV truck deployment, rather than support a long-term shift.

States should delay adoption of the ACT rule until investments are made into a supporting ecosystem.

Trying to force technology into the market by Passing the ACT rule in isolation, will not convince fleets to take the financial and business risk of adopting an entirely new technology without first understanding how it will impact their operations. Rather than risking the ZEV switch, fleets will hold on to their trusted diesel trucks.

California plans to propose significant changes to the existing ACT Rule, and states should review the final amendment before pursuing ACT adoption. In the short term, states should focus on other methods of supporting ZEV expansion including vehicle and infrastructure incentives, such as utility "make ready" programs which prioritize upgrades to support electric vehicle charging at existing building facilities.

What is California doing right?

By adopting the ACT, states are expecting their fleets to accept the same timeline of electric vehicle adoption as California without the support programs to help them be successful.

Beyond implementing its own ACT rule, California has invested significant time and money to establish a conducive ZEV environment:

- **\$10 billion** from budgets over the next six years to support electrification.
- Introduction of the **Low Carbon Fuel Standard** and utility make ready programs.
- **More than 7,000 advanced fuel vehicles over the last decade** through its Hybrid and Zero-Emission Truck and Bus Voucher program.
- Developed a comprehensive statewide action plan for infrastructure.

What must be done instead?

Creating a sustainable marketplace for ZEV adoption relies on the work of all stakeholders to build a conducive, long-term environment for freight electrification. States should instead prioritize:

- Avoiding a **state-by-state patchwork of ZEV regulations** which may benefit businesses in some states at the expense of businesses in other states.
- Incentives to **offset the higher purchase and life-cycle operating costs** of ZEV trucks.

- Funding critical, nonexistent infrastructure such as ZEV truck charging and refueling stations
- **Developing** an electric grid that will ensure power is available to ZEV trucks.
- Passing policies that expedite deployment and contribute to a positive total cost of ownership (TCO) for fleets such as sales tax exemption, low carbon fuel standards, expedited permitting requirements, etc.
- Piloting ZEV deployment projects that build understanding of the challenges fleets face and the policies and programs stakeholders must implement if deployment obstacles are to be overcome.

Although well-intentioned, **passing the ACT rule in the absence of other supportive policies may delay ZEV adoption if fleets' early experiences with these vehicles are negative or onerous.** States should instead develop the staffing and programs to support the purchase of vehicles that are already available in the marketplace.

The **Partners for a Zero Emission Vehicle Future** believe ZEVs are the future of commercial transport. **We support efforts to build a cleaner, more sustainable future through policy that will ensure confidence among fleets and unite economic and environmental benefits around the country.**

We believe:

- **ZEVs are the future of commercial transport**, and all stakeholders must help create a sustainable marketplace for ZEV adoption.
- **The best approach going forward is through coordinated and collaborative federal and state policy**, built on a foundation of enhanced national vehicle standards.
- This national approach **must address critical hurdles to nationwide commercial ZEV deployment** such as **the build-out of necessary charging infrastructure**; it also needs to encourage the deployment of ZEVs across the transportation and logistics supply chain through vehicle purchase incentives.
- **California's state regulations are not well-suited as a one-size-fits-all solution.** Each state is unique—with differences in fleet makeup, grid conditions, and local utility support.
- Regional or state initiatives should help deploy ZEVs where they can best address local air quality concerns and encourage market success to maintain jobs and economic resilience.
- **Working together, we can achieve the end goal of zero-emission, commercial truck fleets.**

Learn more and get involved

Visit us online at www.pzevf.org to learn more about our coalition and efforts.

To stay updated about additional information and opportunities to make a difference, sign up on our website or email us directly at info@pzevf.org.

