

15 January 2021

Northeast States for Coordinated Air Use Management  
Mobile Sources Team

Thank you for the opportunity to provide comments for the multistate Medium- and Heavy-Duty Zero Emissions Vehicles Action Plan. These comments are offered on behalf of the Oregon League of Conservation Voters (OLCV) Metro Climate Action Team (MCAT), based in Portland, Oregon. We engage on many aspects of transportation policy in Oregon, including expansion of the Clean Fuels Program that was mandated by Governor Brown's Executive Order 20-04.

We urge you to consider including the following ideas in the MHDZEV Action Plan:

To help mitigate the high upfront costs of acquiring medium- and heavy-duty electric trucks, the Action Plan should recommend that participating states provide incentives or phased-in mandates for electric utilities to implement versions of the *Pay As You Save* tariffed on-bill financing system.<sup>1</sup> Utilities would procure electric truck batteries (the component most responsible for higher costs) and help to finance the acquisition of charging infrastructure by electric truck fleet operators; utilities would then recover their costs by embedding them in tariffs over the lifetime of the vehicle. The value of electric trucks and buses as assets that can both deliver and draw power from the grid should be recognized in these financing arrangements. Policies of this sort are particularly important given that projections of financial barriers to EV truck adoption have shown that dedicated charging depots are crucial to cost competitiveness.<sup>2</sup>

To facilitate the development of long-haul routes by the heavier electric trucks, the Action Plan should recommend that states assist in accelerating deployment of MHDV-dedicated electric charging infrastructure along heavily-used transportation corridors, such as Interstate I5 in California, Oregon and Washington. This deployment clearly must focus on Class 3 (DCFC) chargers, since charging times for heavy trucks are prohibitively long with Class 2 chargers.<sup>3</sup>

Diesel pollution is a challenging air quality problem in Oregon, and is often particularly concentrated in industrial areas with high concentrations of warehouses, and at transportation hubs such as port facilities and airports, where there are also many non-road emission sources. This health issue has significant equity dimensions given that low income communities and communities of color are more often located near these high pollution zones. School buses that still predominantly use petroleum diesel present similar concerns for a vulnerable population.

---

<sup>1</sup> Electrification Coalition, *Electrifying Freight: Pathways to Accelerating the Transition*, p. 18-19, <https://www.electrificationcoalition.org/electrifying-freight-pathways-to-accelerating-the-transition/>

<sup>2</sup> C. Satterfield and N. Nigro, *Assessing Financial Barriers to Adoption of Electric Trucks*, Atlas Public Policy, February 2020, p. ES-5, <https://atlaspolicy.com/wp-content/uploads/2020/02/Assessing-Financial-Barriers-to-Adoption-of-Electric-Trucks.pdf>

<sup>3</sup> Electrification Coalition, note 1, at p. 7.

We ask that the Action Plan take specific notice of these issues and recommend targeted policies to accelerate the penetration of EV trucks and buses that serve these needs.<sup>4</sup>

Finally, we would like to note that the pioneering California Advanced Clean Truck Regulation is only projected to reduce overall greenhouse gas emissions from medium and heavy duty vehicles from roughly 47 MMT CO<sub>2</sub>(e) per year in 2020 to 40 MMT CO<sub>2</sub>(e) per year in 2040.<sup>5</sup> While we recognize that the absolute magnitude of greenhouse gas emissions reductions is constrained by the challenging technological and financial barriers to EV truck adoption, this projection nonetheless appears inconsistent with the broad goal, expressed by many stakeholders, of reaching net-zero greenhouse gas emissions in the US by 2050. We urge that the Action Plan take explicit notice of these projections, combine them with greenhouse gas reduction estimates for policies enacted for other parts of the transportation sector, and consider opportunities for synergy with policies aimed at decreasing emissions for light-duty EVs and other transportation modes. For example, standardization of the EV supply chain, incentives to bolster specific expertise in EV maintenance by manufacturers and dealers, and better alignment of utility rates with EV charging use patterns would be broadly beneficial for all classes of EVs.

Thank you again for the opportunity to comment; we look forward to engaging further in this important work.

---

<sup>4</sup> Policies for reducing diesel fuel emissions in Portland, Oregon, including EV bus and truck adoption, are described by A. Schlusser et al., *Deconstructing Diesel, A Law & Policy Roadmap for Reducing Diesel Emissions in the Portland Metropolitan Area*, Green Energy Institute at Lewis & Clark Law School, July 2019, <https://law.lclark.edu/live/files/28596-deconstructing-diesel-roadmap> Many of the recommendations in this report will be generalizable to urban areas in other states.

<sup>5</sup> California Air Resources Board, *Final Environmental Analysis for the Proposed Advanced Truck Regulation*, June 23, 2020, Figure 2, p. 54, <https://ww3.arb.ca.gov/regact/2019/act2019/finalea.pdf>