



## AESI Oral Testimony on EPA HD GHG PH3 Proposal

Good afternoon,

I'm Patrick Quinn, Executive Director of AESI which is a trade association representing suppliers of clean mobility technologies for electric and conventional vehicles. We want to thank EPA and the excellent staff of the Office of Transportation and Air Quality (OTAQ) for their collaboration in the development of the Phase 3 HD GHG proposal.

AESI supports the EPA proposal to reduce GHG emissions from heavy-duty trucks by setting performance standards that drive the improved efficiency of diesel ICE engines while accelerating the introduction of electric and hydrogen powertrains. AESI believes that certain critical engine and powertrain technologies, which are not considered in EPA's proposed Phase 3 GHG standards, can be further deployed to reduce the GHG emissions of combustion engines. HD hybrid powertrains, and hydrogen ICE have seen significant advances during the past few years and EPA should account for these cost-efficient carbon reduction technologies in the final rule.

A just released study by the International Council on Clean Transportation (ICCT) finds that "cost effective ICE efficiency improvements remain important to the de-carbonization of the HD sector." AESI agrees with that conclusion. HD Hybrid powertrains, with existing incentives, can deliver up to a 31% GHG reduction in vocational vehicles and 25% in long haul at a small fraction of the cost of an HD battery electric powertrain. Consideration and deployment of these cost-efficient Hybrid powertrains brings an important short-term solution to the de-carbonization of long-haul freight, our most difficult sector challenge in MY 2027-2032.

AESI favors the termination of multipliers for PHEV and BEVs. These technologies are sufficiently incentivized, and the continued use of these multipliers may delay deployment of electric trucks. Multiplier incentives should continue for hydrogen fuel cell vehicles, which remain in the early deployment stage of that technology. EPA should also consider a multiplier for hydrogen combustion trucks; this would accelerate hydrogen infrastructure capacity and the deployment of fuel cell powered trucks.

The clean mobility supplier industry, employing more than 300,000 workers, remains committed to developing and deploying highly advanced technologies to meet the goals of this rule. Thank you for your time this afternoon.