

Current and Future Regulations for Zero Emission Trucks

July 25, 2023









DEPOTS Electric Truck Bootcamp Series

- 1. Best Practices for Utility-Fleet Relationships (April 25th)
- 2. Grants and Incentives for the Trucks and Infrastructure (May 16th)
- 3. Electric Truck Developments (May 30th)
- 4. Faster Charging Opportunities and Challenges at 350KW and higher (June 13th)
- 5. Opportunities to Extend BEV Range (June 27th)
- 6. Electricity Resiliency and Availability (July 11th)
- 7. Current and Future Regulations for Zero Emission Trucks (July 25th)
- 8. Managed Charging to Improve Availability, Cost and Range (August 8th)
- 9. Scaling Charging Infrastructure Equipment (August 22nd)
- **10. Electric Depot Site Planning and Construction** (September 5th)



DEPOTS Electric Truck Bootcamp Series

Up Next: Selecting & Managing Cost-Effective Charging

August 8, 2023 1:00p ET



Charlotte Argue
Senior Manager, Sustainable
Mobility
Geotab



Mark Braby
Chief Commercial Officer
Synop



Joshua Goldman

General ConsVice President of

Mobilityultant

Xendee



Sean Larkin
Senior Director, Medium &
Heavy-Duty Fleets
bp pulse

2023 DEPOT Fleets

Update from The Run Planning...



Follow the Fleets, Drivers, OEMs, EVSEs, Utilities and more:



2023 Infrastructure Report

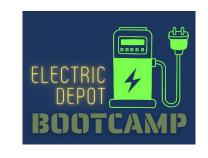


To access the report go to: https://nacfe.org/research/electric-trucks/#charging-infrastructure

Today's Bootcamp Sponsor







Quiz for Today's Session

Completing Today's Quiz:

- Go to runonless.com and click back into the session
- Click 'Take Quiz' button
- Create username and password to keep track of your progress
- Spend a few minutes answering the questions and receive your 2023 RoLE - DEPOT badges





What You Should Know

Q&A

Submit your questions to the host using the Q&A box in the upper right-hand corner

Recording

A recording of today's webinar will be available on runonless.com

Technical Issues

Contact Stephane Babcock at stephane.babcock@gladstein.org







Today's Bootcamp Speakers

Current & Future Regulations for Zero-Emission Trucks



Adam Browning

EVP Policy & Communications

Forum Mobility



John Mikulin

Mobile Source Sub-Lead

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David Treichler

Director of Strategy and

Technology

Oncor Electric Delivery



Ann Xu

Co-Founder and CEO

ElectroTempo, Inc.



Hosted by: **Rick Mihelic**Director of Emerging Technologies





EPA Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles – Phase 3

Overview Briefing of the Proposal

NORTH AMERICAN COUNCIL FOR FREIGHT EFFICIENCY / ROCKY MOUNTAIN INSTITUTE RUN ON LESS ELECTRIC DEPOT BOOTCAMP - WEBINAR #7
TUESDAY 7/25/2023

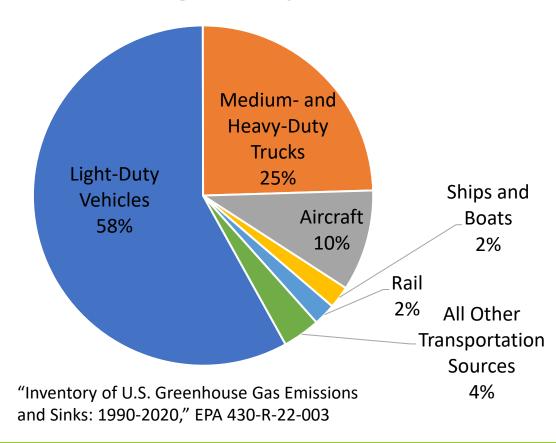
Background: Key Statutory Provisions and Importance of Reducing HD Air Pollution

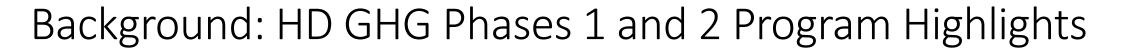


Clean Air Act Statutory Authority

- Section 202(a)(1) of the Clean Air Act (CAA) requires the EPA to "by regulation prescribe (and from time-to-time revise)... standards applicable to the emission of any air pollutant from any class or classes of new motor vehicles or new motor vehicle engines..., which in his judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare."
- Standards take effect "after such period as the Administrator finds necessary to permit the development and application of the requisite technology, giving appropriate consideration to the cost of compliance within such period."
- EPA also must consider issues of technological feasibility, compliance cost, and lead time. EPA may consider other factors.

HD is the 2nd largest source of GHG emissions in the transportation sector, and a significant source of local and regional air pollution



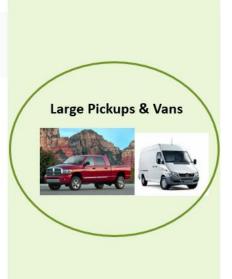




- Standards set by heavy-duty regulatory categories, e.g., tractors, vocational vehicles, large pickups/vans
- Phase 1 vehicle standards implemented 2014 through 2018;
 Phase 2 program started in 2021, fully phase in by 2027







When designing program in 2016, EPA envisioned these technologies *could* be used to meet Phase 2:

- Engine, transmission, and driveline improvements
- Extended and workday idle reduction technologies
- Aerodynamic devices
- Lower rolling resistance tires
- Automatic tire inflation systems
- Weight reduction
- Engine stop start
- Powertrain hybridization
- Combustion optimization
- Improved air handling
- Reduced friction within the engine
- Improved emissions after-treatment technologies
- Engine waste heat recovery





HD ZEV market

- Over 200 models in use today for some applications, many more applications to come
- Costs of ZEV technologies are projected to fall
- Manufacturers have set goals for ZEV sales reaching 50-60% by 2030
- Inflation Reduction Act and Bipartisan Infrastructure Law provide many monetary incentives to support the supply chain, production, and purchase of HD ZEVs and associated infrastructure
- Actions by states to accelerate adoption of HD ZEVs
 - Multi-State Medium- and Heavy-Duty Zero Emission Vehicle MOU signed by 17 states, D.C., and Quebec to achieve 100% MHD ZEV sales by 2050 and 30% by 2030 in their jurisdictions
 - California's Advanced Clean Trucks program adopted by 8 states and requiring 40-75% MHD ZEV sales by 2035

Background: Scope of HD Phase 3 and EO 14037



Light- and Medium- Duty Proposal

Light-Duty



HD Phase 3 Proposal

Vocational Vehicles



Short-haul Tractors



Long-haul Tractors



Executive Order 14037, "Strengthening American Leadership in Clean Cars and Trucks," August 2021, provides EPA direction for this rulemaking

Medium- and Heavy-Duty Engines and Vehicles Greenhouse Gas and Fuel Efficiency Standards as Soon as 2030 and Later.

(3b)The Administrator of the EPA shall, as appropriate and consistent with applicable law, and in consideration of the role that zero-emission heavy-duty vehicles might have in reducing emissions from certain market segments, consider updating the existing greenhouse gas emissions standards for heavy-duty engines and vehicles beginning with model year 2027 and extending through and including at least model year 2029.

(4a) The Administrator of the EPA shall, as appropriate and consistent with applicable law, consider beginning work on a rulemaking under the Clean Air Act to establish new greenhouse gas emissions standards for heavy-duty engines and vehicles to begin as soon as model year 2030.

EPA Clean Trucks Plan



https://www.epa.gov/regulations-emissions-vehicles-and-engines/clean-trucks-plan

Heavy-Duty 2027 Criteria Pollutant Emissions Standards

- Finalized in December 2022, effective for U.S. model year 2027+ heavy-duty on-highway engines
- Increased Performance Stringency (FTP/SET vs. U.S. 2010+): >82% NOx, 50% PM2.5, >57% HC, >61% CO
- Rule Page https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-and-related-materials-control-air-pollution

Light and Medium-Duty Multi-Pollutant Emissions Standards

- Proposed standards for model year 2027+, comment period closed on 7/5/2023
- Docket ID # EPA-HQ-OAR-2022-0829 https://www.regulations.gov/docket/EPA-HQ-OAR-2022-0829

Heavy-Duty GHG Phase 3 Emissions Standards

- Proposed standards for model year 2027+, comment period closed on 6/16/2023
- Docket ID # EPA-HQ-OAR-2022-0985 https://www.regulations.gov/docket/EPA-HQ-OAR-2022-0985





- EPA is not proposing a ZEV mandate. The agency is proposing stronger performance-based CO₂ emission standards that begin in MY 2027 and phase in through MY 2032.
 We also request comment on standards more and less stringent than the proposal, as well as standards extending to MY 2035.
- The proposed standards align with and support the commitments and investments
 from trucking fleets, vehicle manufacturers, and U.S. states as they plan to increase the
 use of zero-emission vehicle (ZEV) technologies in heavy-duty fleets.
- The proposal considers new information such as the Bipartisan Infrastructure Law and the Inflation Reduction Act, which provide unprecedented investments to support the development of and market for ZEV technologies and their infrastructure.





- Phase 3 standards maintain the flexible structure created in EPA's Phase 2 GHG program, which is
 designed to reflect the diverse nature of the heavy-duty industry
- The proposed standards are performance based and do not mandate the use of a specific technology
- Standards are first differentiated between tractors and vocational vehicles
 - Vocational vehicles are divided into 23 different subcategories for setting standards 8 are for specialized vehicles
 - For tractors, standards are divided into 10 different subcategories for standards
 - o In total, there are 33 unique HD vehicle subcategories for standards for each model year of the program
- Optional CO₂ Emissions Averaging, Banking and Trading (ABT) program
 - Allows emissions credits to be generated and used to meet the standards
 - 5-year credit life, 3-year deficit carry forward
- Note: EPA is not proposing to change the separate CO_2 , N_2O and CH_4 standards for HD engines set under the Phase 2 program





- For each model year of the program, EPA projects a technology mix that could be used to meet the proposed standards and those we ask for comment on by aggregating projected ZEV adoption rates from 100+ individual vehicle types
- Underlying these aggregated ZEV adoption rates, EPA expects some specific vehicle applications to achieve much higher adoption rates (e.g., 55% for school buses and 80% for step vans)

Proposal	2027	2028	2029	2030	2031	2032
Vocational	20%	25%	30%	35%	40%	50%
Short-Haul Tractors	10%	12%	15%	20%	30%	35%
Long-Haul Tractors	0%	0%	0%	10%	20%	25%
Alternative	2027	2028	2029	2030	2031	2032
Vocational	14%	20%	25%	30%	35%	40%
Short-Haul Tractors	5%	8%	10%	15%	20%	25%
Long-Haul Tractors	0%	0%	0%	10%	15%	20%
Seek Comment – CARB ACT Rule	2027	2028	2029	2030	2031	2032
Vocational	20%	30%	40%	50%	55%	60%
Tractors	15%	20%	25%	30%	35%	40%



Estimated Cost to Manufacturers for Model Year 2032 Vehicles

- The average per-vehicle estimated cost to manufacturers for 2032 ZEVs and internal combustion engine vehicles combined are shown by regulatory group in the table below
- These estimates account for the battery tax credit under the Inflation Reduction Act (IRS 45X), but not the vehicle tax credit (IRS 45W) as this credit is available to purchasers (next slide)

Regulatory Group	Fleet-Average Per-Vehicle Manufacturer Cost		
LHD Vocational	-\$4,300		
MHD Vocational	\$330		
HHD Vocational	\$2,300		
Short-Haul (Day Cab) Tractors	\$8,000		
Long-Haul (Sleeper Cab) Tractors	\$11,000		

For comparison, the projected fleet average per-vehicle costs projected of the HD GHG Phase 2 CO₂ standards were:

- between \$1,500 and \$5,700 per vehicle for MY 2027 vocational vehicles
- between \$10,000 and \$14,000 per vehicle for MY 2027 tractors



Estimated Cost and Payback for Purchasers of MY 2032 Vehicles

- The per-vehicle estimated upfront cost to purchasers for a 2032 ZEV relative to a comparable internal combustion engine vehicle are shown in the table below, including vehicle and EVSE costs
- This is supported by incentives such as tax credits under the Inflation Reduction Act, including the vehicle tax credit (IRS 45W) and the battery tax credit (IRS 45X)
- We project the upfront cost increases would be recouped by owners over the vehicle lifetime through operational savings, with pay back periods ranging from 1 to 7 years

Regulatory Group	Upfront vehicle cost difference (including tax credits)	Upfront EVSE costs	Annual Operational Savings (fuel, M&R)	Payback period (year)
LHD Vocational	-\$9,600	\$11,000	\$4,000	1
MHD Vocational	-\$2,900	\$14,000	\$5,400	3
HHD Vocational	-\$8,500	\$17,000	\$7,400	2
Short-Haul (Day Cab) Tractors	\$580	\$17,000	\$6,800	3
Long-Haul (Sleeper Cab) Tractors	\$15,000	\$0	\$2,300	7

Projected Emission Impacts of the Proposed GHG Standards

- GHG Emission Impacts
 - Net (downstream and upstream) cumulative CO₂ reductions of 1.8B metric tons through 2055
 - Downstream CO₂ reductions of 2.2B metric tons through 2055 (18% reduction vs. baseline)
 - Upstream CO₂ increases from power plants of **0.4B metric tons** through 2055
 - Equivalent to a whole year's emissions from the entire transportation sector
- Non-GHG emission impacts that would result from increased use of ZEV technology projected under the Phase 3 program
 - In 2055 (U.S. Short Tons)

Pollutant	<u>Downstream</u> Vehicle Emissions	Electricity Generation Units	Refinery	Net Impact
Nitrogen Oxides (NO _X)	-71,000	790	-1,800	-72,000
Primary PM _{2.5}	-970	750	-440	-650
Volatile Organic Compounds (VOC)	-21,000	750	-1,200	-21,000
Sulfur Dioxide (SO ₂)	-520	910	-640	-250

Monetized Benefits to Society



- The Phase 3 Program would reduce adverse impacts associated with climate change and exposure to non-GHG
 pollutants and thus would yield significant benefits, both monetized and unmonetized
- EPA estimates that monetized net benefits to society would be approximately \$320B through the year 2055, more
 than 5 times the cost in vehicle technology and associated electric vehicle supply equipment (EVSE) combined
- The cost of vehicle technology (not including the vehicle or battery tax credits) and EVSE would be approximately \$9B and \$47B respectively
- The HD industry would save approximately \$250B in operating costs (e.g., savings that come from less liquid fuel
 used, lower maintenance and repair costs for ZEV technologies as compared to ICE technologies, etc.)
- Significant social benefits include:
 - \$87B in climate benefits
 - Between \$15B and \$29B in reduced emissions of non-GHG pollutants, primarily those that contribute to ambient concentrations of PM2.5
 - \$12B in energy security benefits from 4.3B barrels of reduced oil imports

Values presented here are present value for 2027 through 2055 at 3% discount rate in 2021 dollars

HD Phase 3 Rulemaking Timeline



- Public hearings were held on May 2 and 3
- Public comment period closed on June 16
 https://www.regulations.gov/docket/EPA-HQ-OAR-2022-0985
- Goal is to issue the final rule as soon as December 2023
- See EPA's website for more information on this rulemaking

https://www.epa.gov/regulations-emissions-vehicles-and-engines/proposed-rule-greenhouse-gas-emissions-standards-heavy

Ideas, Comments, Questions...?

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https://www.epa.gov/aboutepa/about-office-air-and-radiation-oar



The Context of Electric Transportation Tariffs



One Size Does Not Fill All: 2,938 Utilities and Cooperatives

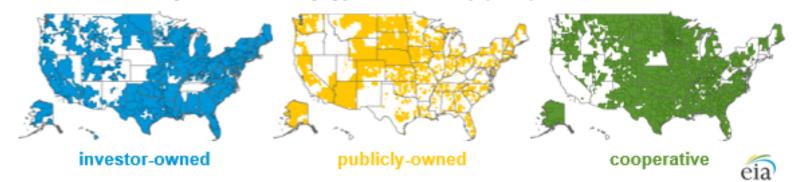


Investor-owned utilities, or IOUs, are large electric distributors that issue stock owned by shareholders. Almost three-quarters of utility customers get their electricity from these companies. IOUs are most prevalent in heavily populated areas on the East and West coasts. In 2017, 168 IOUs served an average of 654,600 electric customers. The two largest IOUs are in California: Pacific Gas and Electric, with 5.48 million customers, and Southern California Edison Company, with 5.07 million customers.

Publicly owned utilities, or POUs, include federal-, state-, and municipal-run utilities. In addition to government entities, political subdivisions may run POUs, also called public utility districts—utilities that residents vote into existence that operate independently of city or country government. The United States has 1,958 POUs with an average of 12,100 electricity customers each. The largest POUs are the state-run Puerto Rico Electric Power Authority (PREPA), with 1.47 million customers, and the Los Angeles Department of Water and Power, a municipal utility with 1.43 million customers.

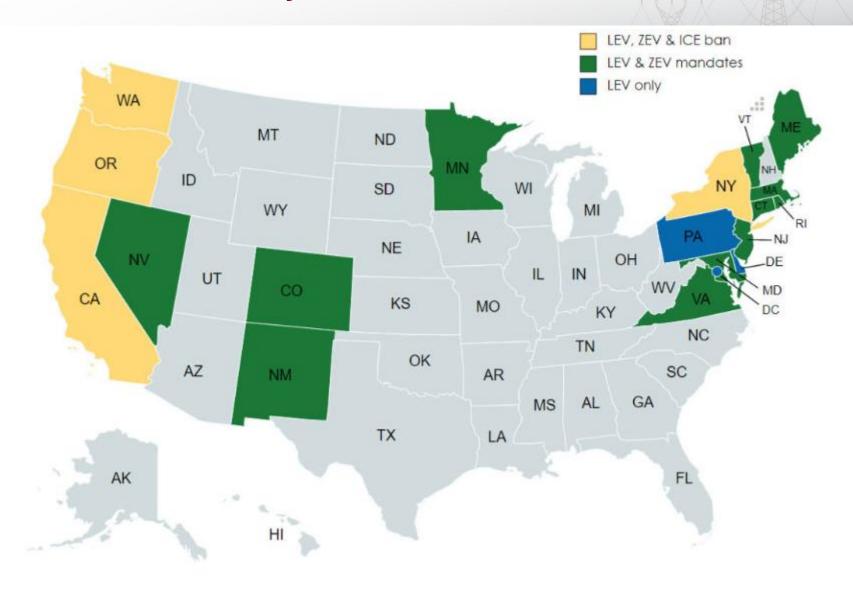
Cooperatives, or co-ops, are not-for-profit member-owned utilities. Co-ops are located in 47 states but are most prevalent in the Midwest and Southeast. The United States has 812 co-ops with an average of 24,500 electricity customers each. The largest co-op is Pedernales Electric Co-op, in Johnson City, Texas, with 333,809 customers, nearly 50% more customers than the second-largest co-op, Jackson Electric Member Corporation, in Jefferson, Georgia.

Counties served by U.S. utilities, by type of ownership (2017)



Economics vs Public Policy





Basic Tariff Principles



TARIFF DESIGN OBJECTIVES

Tariffs are designed to:

- Ensure cost recovery for utility
- Ensure revenue stability for utility
- Fairly apportion the cost of service to different customers based on "cost-causation"
- Encourage energy conservation and "grid-friendly" behavior

TARIFF ATTRIBUTES

Tariffs should be:

- Simple
- Understandable
- Feasible to implement
- Publicly acceptable

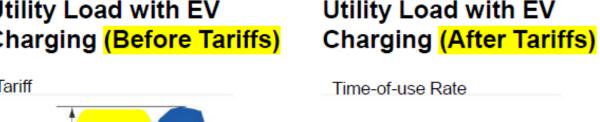


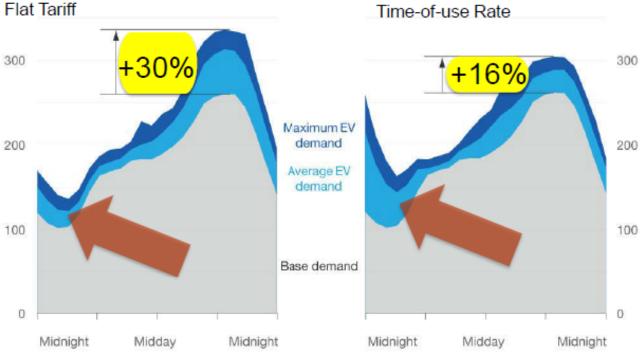


Peak vs Off Peak Charging Impacts

- EVs can have a large impact on a utility's load
- This large, new demand can help OR hurt a utility
- Tariffs are used to manage this new demand in a helpful way

Utility Load with EV Charging (Before Tariffs)









Source: https://www.mckinsey.com/industries/automotive-andassembly/our-insights/the-potential-impact-of-electric-vehicleson-global-energy-systems

Underlying Issues That Will Drive Changing Tariffs: Uncontrolled Charging



- 1. Resource Adequacy Is there enough generation to meet the demand from large transportation loads?
- 2. Extreme utilization impacts on utility equipment especially transformers which are in short supply
- 3. Cost Shifting not everyone benefits and should therefore pay more
- 4. Stranded Assets utility investment to serve a load that is subsequently abandoned and therefore does not produce the assigned recovery.

Utility Perspective: Electric loads take time to construct and connect. Usually a year or more. Large loads usually take multiple years. Our regulated processes are designed to react to this time scale. We cannot speed the process if a public commission must approve our investments and their approval takes up to a year before we even begin.

However, an electric truck can generally be delivered in a matter of months.

Therefore, initiate your electrical service upgrades well before ordering your electric trucks.



electrotempo

Charging Network
Planning & Intelligence

ElectroTempo.com



ElectroTempo accelerates & future-proofs investments for electric vehicles

Product Summary

Machine learning tools that optimize the total cost of ownership for EVs and associated infrastructure.

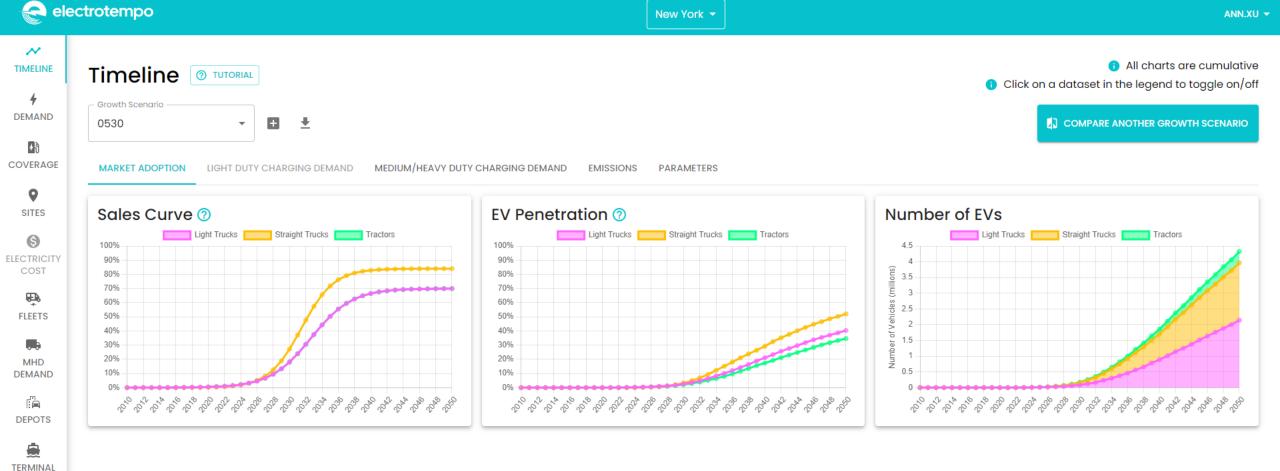
Traction

Our software supports clients in deploying and managing EV infrastructure across fleets, site hosts, and utilities

Active Customers

national grid	EVOLVE HOUSTON	ĀM	ATKINS
CEVILOGISTICS	PROLOGIS	THE PORT OF VIRGINIA.	U.S. DEPARTMENT OF ENERGY
INSIGY! WATER COMMUNITY SERVICES	AUSTIN	CDS	NEW BRAUNFELS

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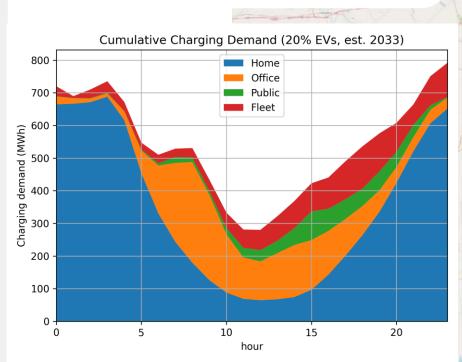


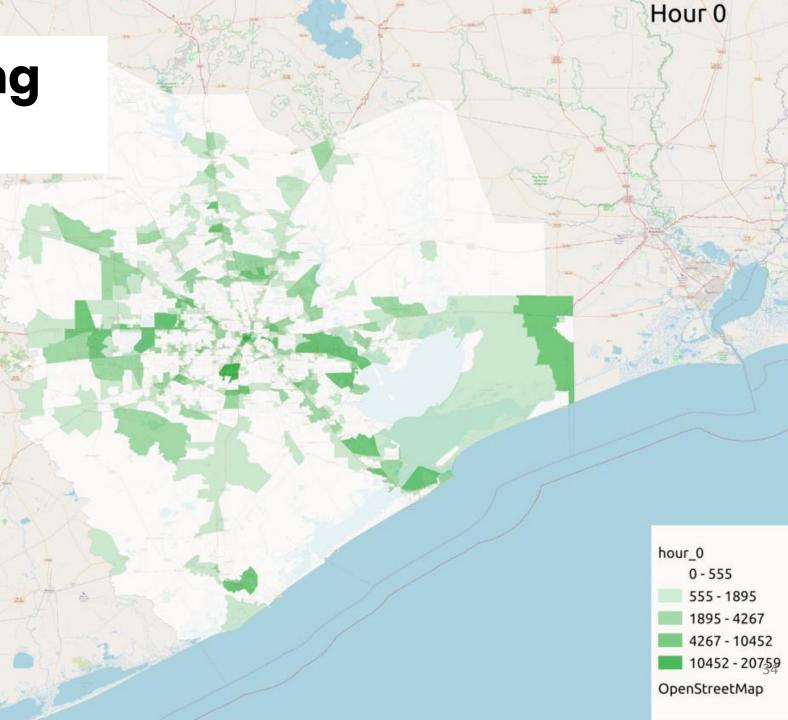
Rapidly model a range of EV adoption scenarios based on market input

UPLOAD

Simulate Charging Demand

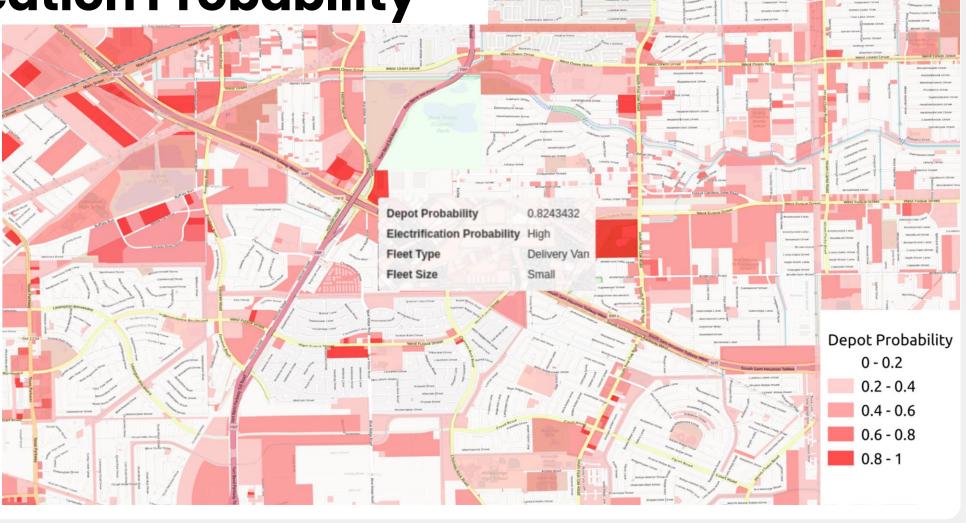
- Overlay light-, medium-, and heavy-duty vehicle charging demand
- Assess availability of capacity and real estate

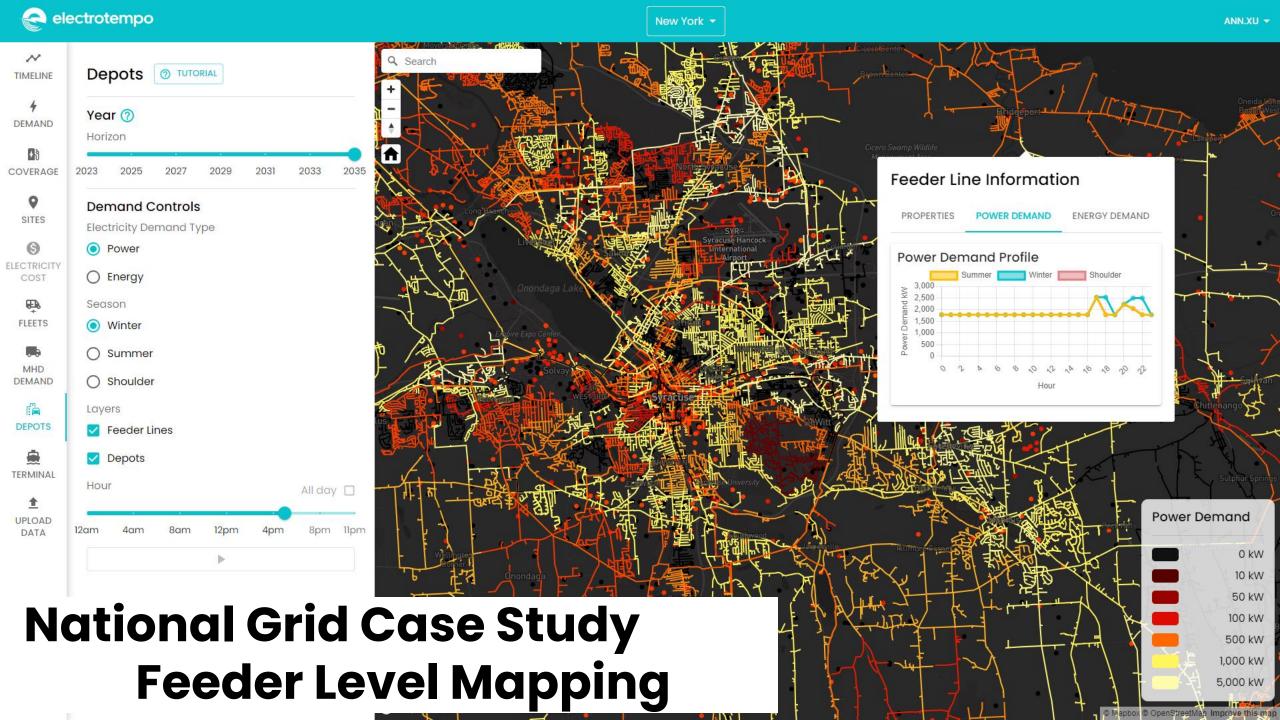




Predict Fleet Depot Electrification Probability

Plan and execute customer engagement programs based on a data-driven approach









The policy components of ZEV market transition

Success means cleaner air for our communities, a safer climate, and lower cost per mile for truckers.

- Demand drivers: build scale
- Cost equalizers: glidepath to diesel parity
- Interconnection/infrastructure enablers



Demand drivers: mandates

States adopting California's Advanced Clean Trucks Rule



State	Status	Beginning MY	Fleet Reporting Date
California	Adopted	2024	April 1, 2021
Massachusetts	Adopted	2025	Not required
New Jersey	Adopted	2025	April 1, 2023
New York	Adopted	2025	April 1, 2023
Oregon	Adopted	2025	June 30, 2022
Vermont	Adopted	2026	Not required
Washington	Adopted	2025	September 30, 2023
Colorado	Adopted	2024	November 30, 2024 December 31, 2027
Connecticut	Preliminary Rulemaking Process	2024	-
Maine	Preliminary Rulemaking Process	2026	-
Maryland	Preliminary Rulemaking Process	2027	-
North Carolina	Preliminary Rulemaking Process	2027	-
Rhode Island	Draft Rule Language Released	2027	Not required
DC	In Review	-	-
Illinois	In Review	-	-
As of May 17, 2023			



California's Advanced Clean Fleets:

MHD ZEVs in California:

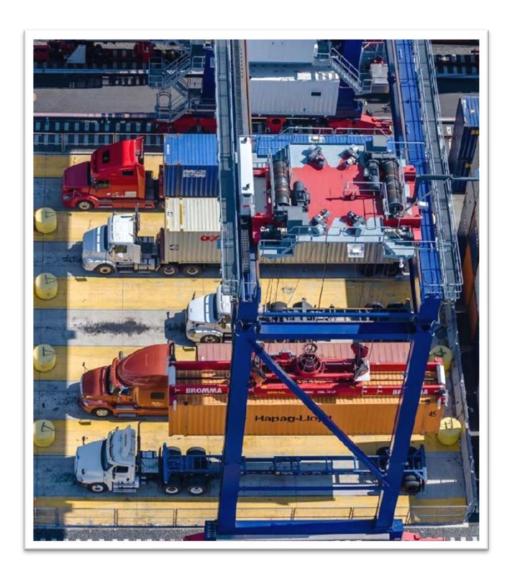
- 510,000 in 2035
- 1,350,000 by 2045
- 1,690,000 by 2050

Charging Infrastructure Needed

- 157,000 chargers will be needed to support 180,000 medium- and heavy-duty trucks by 2030
- Average install rate of 53 MHD chargers a day through 2030
- 2031-2045: need average install rate of 229 MHD chargers a day



Metrics of Transition for CA Drayage by 2035







>2,500MW

-Charging capacity need

-2,200 chargers a year





~\$26B Needed

~\$9B for trucks ~\$10B for real estate ~\$7B for chargers

Cost equalizers: diesel parity

- Long term TCO is promising: lower costs per mile within sight
- Every investment has to compete, and diesel has a long tail
- Trucks, chargers, charging: each need investment



LCFS

Low Carbon Fuel Standard Program

Free electricity and more for electric vehicles

LCFS is a market-based program focused on reducing carbon intensity by providing carbon credit generation opportunities that offsets electricity costs and more in many cases.



Hybrid & Zero-Emission Truck & Bus Voucher Incentive Project

50% Instant rebate on ZEV Trucks

HVIP provides point-ofpurchase price reductions.

Forum developed a program with CARB called Innovative Fleet, a \$25MM program targeted at Independent Operators



Port Infrastructure Development Program

80% cost sharing on ZE infrastructure for ports

\$450M in funding to improve safety, efficiency, and reliability of movement of goods through ports

Additional incentives through other programs including:

- <u>Bay Area AQMD</u>: Carl Moyer Program
- Bay Area AQMD: Proposition 1B – Goods Movement Emission Reduction Program
- CARB: VW Environmental Trust
- <u>CEC:</u> Clean
 Transportation Program
 (aka Alternative
 Renewable Fuel
 Technology Program)
- CEC: EnergIIZE



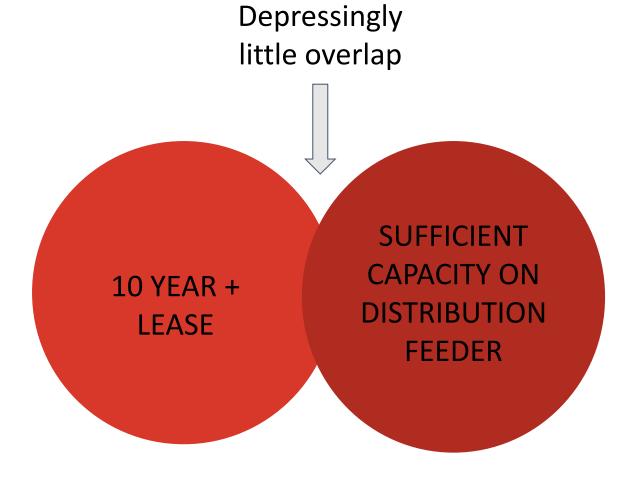
Infrastructure/Interconnection

Short term:

- speed of interconnection
- transparent hosting capacity analysis for siting new depots
- Medium term: maximize utilization of existing distribution system
 - Tetris more load via dynamic tariffs, protective relays
- Long term:
 - Allow utilities to proactively build out in freight corridors



Why are 3rd Party Depots Important?



- Many fleets and owner/operators will not be able to charge trucks where currently domiciled
 - Drayage is 80% independent owner-operator
 - Over 50% of warehouses are > 5year leases
- Third-party depots are sited on freight routes, in places where power is available.
- This increases speed of deployment, and by maximizing utilization of existing grid infrastructure, reduces overall ratepayer costs of electrification.

The Forum Mobility Solution

- Forum Mobility is building a network of charging depots, sited specifically for drayage, in and around ports and along freight corridors to common freight destinations.
- Forum offers two options:
 - Charging only you bring your truck
 - A battery-electric truck and charging together
- Fees are monthly, terms are 2-4 years



Forum Depot – Livermore/Greenville Example



Livermore Site:

- 96 Truck Facility
- 6 MW
- Mix of fast chargers and overnight dwell
- Driver parking













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Current & Future Regulations for Zero-Emission Trucks



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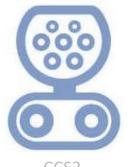


Moderator: **Rick Mihelic**Director of Emerging Technologies















NORTH AMERICAN COUNCIL FOR FREIGHT EFFICIENCY

NACFE

MCS or CharlN NACFE.org

Let's Stay Connected... ... And charged up!



NACFE (& Spanish: NACFE LATAM)



NACFE



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NACFE



