



June 3, 2022

Governor Roy Cooper
North Carolina Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor Cooper:

As vehicle manufacturers, infrastructure provider ready to deploy zero-emission technologies in North Carolina as well as major businesses, institutions, employers, investors, and business groups with significant investments in the state, we write to express our strong support for adoption of the Advanced Clean Trucks (ACT) and Heavy-Duty Omnibus (HDO) rules in North Carolina before the end of 2023.

In 2020, through your leadership, North Carolina joined over a dozen states in signing a [joint memorandum of understanding](#) (MOU), committing to electrifying, and eliminating toxic air pollution from new medium- and heavy-duty vehicles (MHDVs) by 2050. This spring, the MOU signatory states released a draft Action Plan that highlights adoption of the ACT and HDO rules as powerful tools to reach the MOU's goals. Six states have already adopted the ACT rule and three have adopted the HDO rule including New Jersey, New York, Massachusetts, Oregon, Washington and California. Several more states are considering adoption, including Colorado, Connecticut, Maryland, and Maine.

The ACT rule is designed to reduce costs of zero-emission MHDVs by requiring manufacturers to increase model availability, which helps meet the needs of fleet operators across multiple vehicle classes and further develops the market for these vehicles in our state. The ACT rule will also drive investment in clean transportation research and development. We expect that adopting the ACT rule will enable cost-effective electrification of MHDVs at the pace and scale needed to meet climate and air quality goals, while delivering public health and economic benefits for communities and businesses alike.

Meanwhile, the HDO rule will reduce dangerous air pollution from new combustion trucks and encourage manufacturers to produce more durable vehicle parts. Adopting HDO will result in significant public health cost savings before there is a full-scale transition to zero-emission vehicles sales, while reducing maintenance costs for fleets.

We understand the risks of climate change and impacts of air pollution, and we have made significant commitments to reduce our greenhouse gas (GHG) emissions in order to protect the health and economic well-being of the communities in which we live and operate.

Transportation is the largest source of GHG emissions across the nation and a substantial component of our carbon footprints. Transportation emissions also release harmful air pollutants that disproportionately impact low-income communities. Improving air quality is the right thing to do for public health and for these communities, and also makes economic sense. Fewer instances of respiratory illness, missed days of work, and hospitalizations will increase personal disposable income and help reduce the financial pressure on our healthcare system. These impacts cross state lines, just like the MHDVs in our fleets and value chains.

Increased access to cost-effective zero-emission MHDVs will allow us to remain competitive in a market where our customers, investors, patients, and employees increasingly expect us to lead on sustainability. Low- and zero-emission vehicles offer significant cost savings through lower fuel and maintenance costs and reduce the risks associated with the volatility of fossil fuel prices and supply. MHDV electrification will support domestic innovation and investment in clean technology manufacturing—creating new domestic jobs, cutting costs for our value chains, mitigating climate risk, improving public health, and reducing healthcare costs.

However, MHDV electrification still faces significant challenges due to higher upfront costs and battery range. Market-enabling policies like the ACT and HDO rules will rapidly accelerate the long-term cost savings, climate, and clean air benefits of MHDV electrification, while spurring widespread deployment of charging stations that will support MHDVs. The more states that adopt ACT and HDO rules, the greater the market-forcing benefits, thereby lowering costs and creating a more stable and self-sustaining market.

We strongly support adoption of the ACT and HDO rules in North Carolina to accelerate MHDV electrification, help the state meet the goals outlined in your [Executive Order 246](#), allow both manufacturers and fleet operators to capture savings from economies of scale, and provide more cost-effective emissions reductions.

Sincerely,

ABB

AMPLY

Arjuna Capital

Arrival

Bollinger Motors

BYD

Carolina Solar Energy

Ceres, Inc.

Chambers for Innovation & Clean Energy

ChargePoint

Cree Lighting

Eaton

EQ Research

Earth Equity Advisors

E2 (Environmental Entrepreneurs)

FlexGen

Highland Electric Fleets

HYZON Motors

IKEA

Lion Electric

Nestlé

New Belgium Brewing

Nikola

Proterra

Rivian

Sierra Nevada Brewing Co.

TerraWatt Infrastructure

Tesla

Unilever

Xos

Zeem Solutions