



March 12, 2025

**Environment and Transportation Committee
Maryland House of Delegates**

HB 1556

**Environment – Advanced Clean Cars II Program and
Advanced Clean Trucks Regulation – Application and Enforcement**

Sponsor: Delegate Dana Stein

**Katie Mettle
Policy Principal, Advanced Energy United**

UNFAVORABLE

Dear Chair Korman, Vice Chair Boyce, and honorable members of the Environment and Transportation Committee:

For the record, my name is Katie Mettle, and I am the Maryland Policy Principal for Advanced Energy United. We are a national industry association of businesses working to accelerate both transportation electrification and to grow clean energy industries in the United States. Our membership includes a broad coalition of vehicle manufacturers that produce light-, medium-, and heavy-duty electric vehicles (EV); charging infrastructure providers; vehicle fleet operators; and firms that provide supportive technologies, and services to identify electrified transportation solutions.

Advanced Energy United opposes HB 1556. This bill will suspend enforcement and penalty provisions for failure to meet the California Advanced Clean Cars II (ACCII) Program or the

Advanced Clean Trucks (ACT) Regulations for model years 2027 and 2028. This effectively delays implementation of these laws until model year 2029.

ACT does not place purchasing requirements on dealers or fleets, nor does it mandate fleet-wide compliance. ACCII and ACT provide manufacturers with several flexible compliance tools, including credit averaging, banking, hybrid truck sales, and secondary market credit trading, which allow car and truck manufacturers to meet their targets. In addition, manufacturers have up to three years to resolve compliance shortfalls before enforcement.

ACT rewards early action. These rules incentivize early movers to over-deliver, which improves the near-term economics of EV manufacturing and creates pathways for others to achieve lower-cost compliance. The result is a market-driven transition that prioritizes emission reductions without unnecessary regulatory burden.

With clearly defined, long-term EV sales targets, the regulations allow businesses throughout the supply chain and in adjacent industries to confidently invest, and to create predictability for resource adequacy and utility forecasting. Delaying the implementation of ACCII and ACT would create uncertainty.

If ACT implementation begins with Model Year 2027 instead of 2025, manufacturers will face a steep 15% zero-emission sales mandate for Class 8 trucks immediately in 2027, compared to the more gradual 7% requirement beginning in 2025. This compressed timeline risks overwhelming supply chains, utilities, and fleet operators.

Experience from other ACT states demonstrates that the industry is well-positioned to meet the regulation's targets. In California and Oregon, truck manufacturers are already earning early credits and exceeding compliance schedules¹. These states illustrate that the market is prepared for the transition and that maintaining ACT timelines drives innovation and investment. Delaying the rule would disrupt credit accrual systems, eroding the market stability necessary for manufacturers to achieve long-term compliance.

We respectfully request an unfavorable report. Thank you for your time and consideration.

Best Regards,

¹ Oregon Department of Environmental Quality, *Advanced Clean Trucks Reporting*, available at www.oregon.gov/deq/aq/programs/pages/mdhdzev.aspx; California Air Resources Board, *Advanced Clean Trucks Compliance and Incentive Update*, available at www.arb.ca.gov/resources/documents/advanced-clean-trucks-compliance-and-incentives-update.

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