RIVIAN



11 March 2025

Chairman Marc Korman Maryland House of Delegates Annapolis, MD 21401

SUBJECT: Rivian Opposition to House Bill 1556

Dear Chairman Korman and Members of the Environment & Transportation Committee:

On behalf of Rivian Automotive, LLC ("Rivian" or the "Company"), I would like to express the Company's strong opposition to House Bill 1556, a measure that would set back Maryland's ambitious drive to transition its transportation sector away from fossil fuels. Rivian supported the Maryland legislature when it adopted the Advanced Clean Cars II ("ACCII") and Advanced Clean Trucks ("ACT") regulations in 2023 and continues to support the right of states to adopt the most protective vehicle emissions standards available under Section 177 of the federal Clean Air Act. The Company also recognizes the valuable role of states in helping the U.S. lead global efforts to decarbonize transportation in an equitable manner while maintaining the societal benefits of domestic technology development and production.

Rivian is an independent American electric vehicle manufacturer and technology company headquartered in Irvine, CA with a production facility in Normal, IL. The Company produces a pickup (R1T) and SUV (R1S), each capable of ranges exceeding 400 miles on a single charge. Additionally, Rivian produces a commercial delivery van (RCV) for fleet use that is available for purchase by businesses nationwide. The Company operates a direct-to-consumer sales model for all of its automotive products, ensuring each customer wishing to purchase a Rivian is provided a uniform experience and is offered identical pricing and financing options. Rivian operates more than 70 retail and service centers in 20 states, including a location in Gaithersburg, that employs more than 50 people.

The ACCII and ACT regulations have never been more important. To mitigate and reverse the harms caused by greenhouse gas emissions in transportation, our society must accelerate the replacement of more than 1.5 billion combustion-powered cars with zero emission vehicles. The

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electric vehicle market has grown beyond early adopters and is entering the mainstream—the opportunity our industry has been waiting for to unlock scale! However, we cannot lose sight of the fact that policy plays an equally important role alongside the consumer market and industry at this juncture. To keep us all moving in concert, we need ambitious policies like ACCII and ACT to set the pace.

ACCII and ACT will increase consumer choice for electric vehicles by incentivizing manufacturers to make more products available at competitive prices; maximize emissions reductions at the lowest cost by providing manufacturers with several compliance tools and flexibilities; and support long-term planning by industry to secure American competitiveness. Vehicle manufacturers are well positioned to comply with the requirements established by Maryland Department of Environment in both the light and medium-heavy duty sectors. Sales targets ramp up gradually, and manufacturers may use credit averaging, banking, and trading rules to satisfy shortfalls.

The targets established in the ACCII and ACT rules are achievable, therefore efforts to delay enforcement should be highly scrutinized. Further, Maryland's enforcement capabilities do not take effect until Model Year 2027. Delaying the rules now, before the program has even begun, and which already includes the ability to carry-forward deficits through 2030, will not serve to benefit manufacturers. The 2027 enforcement delay will result in reduced charging infrastructure investment and reduced sales of electric vehicles, causing Maryland to fall behind in its efforts to transition away from fossil fuels.

Undoubtedly, the scale of change needed in transportation is enormous: shifting the on-road fleet from fossil fuels to electricity will not be easy. But this is a once-in-a-planet opportunity, and we are lucky to be a part of it! Thanks to the leadership previously shown by this legislature, Maryland is on the right path—and Rivian urges this Committee to stay the course by opposing House Bill 1556.

Thank you for your consideration,

Beau Whiteman
Director, State Affairs