

V O L V O

TO: The Honorable Kumar Barve, Chair
Members, House Environment & Transportation Committee
The Honorable Malcolm Augustine

FROM: Richard A. Tabuteau

DATE: March 29, 2023

RE: **FAVORABLE** – Senate Bill 224 – *Department of the Environment - Zero-Emission Medium- and Heavy-Duty Vehicles - Regulations (Clean Trucks Act of 2023)*

Senate Bill 224, as amended in the State Senate with the good faith participation of numerous key stakeholders, requires the Maryland Department of the Environment (MDE), by December 1, 2023, to adopt regulations establishing requirements for the sale of new zero-emission medium- and heavy-duty vehicles in the State. The regulations must update existing regulations and incorporate by reference the California Air Resources Board's vehicle standards, as revised and updated. MDE, in consultation with the Department of Transportation (MDOT), Department of General Services (DGS), the Maryland Energy Administration (MEA), and the Public Service Commission (PSC), must prepare and submit to the General Assembly a needs assessment and deployment plan. MDE may delay implementation of regulations, after consulting MDOT, DGS, MEA, and PSC, if implementation of the regulations is not yet feasible.

Volvo and Mack Trucks are the North American industry leaders in Zero-Emission (ZE) Class 8 trucks. We applaud Senator Augustine's commitment to the environment and share the same goal of accelerating medium- and heavy-duty zero-emission vehicles in the marketplace; however, we don't believe that Maryland's adoption of the Advanced Clean Truck regulation (ACT) can succeed without careful planning and creation of a supportive ecosystem for these vehicles.

Senate Bill 224, as amended, recognizes some of the measures needed to address numerous structural impediments to achieving the sales goals in the California ACT. Importantly, it includes a mechanism to delay implementation if the State is not yet ready. Sustained adoption of ZE Class 8 trucks requires a complex network of programs, policies, and regulations to facilitate cooperation across multiple key stakeholders, including energy providers – utilities and grid operators, charger manufacturers, state and local government officials, component suppliers, commercial fleets, dealerships, and many others. Senate Bill 224, as amended, is a thoughtful approach toward future widespread adoption of ZE medium- and heavy-duty vehicles.

Volvo Group urges the House Environment & Transportation Committee to give Senate Bill 224, as amended, a favorable report.

For more information call:
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