Submitter:	Elaine Truitt-LeCavalier
On Behalf Of:	CARSON
Committee:	House Committee On Climate, Energy, and Environment
Measure, Appointment or Topic:	HB3119

Chair Lively, members of the committee, my name is Elaine Truitt-LeCavalier, Sr. Director of Business Operations with Carson. I am here in support of HB3119.

Carson supports sustainable change in Oregon and is committed to partnering in reducing emissions to improve air quality through being a leading provider and distributor of lower carbon intensity fuels. Before the Oregon Clean Fuels Program, Carson was already a major biodiesel supplier in Oregon and is the current top renewable diesel supplier.

We have been communicating our concerns to DEQ. The ACT timeline needs adjustment for the State to effectively reach realistic goals using zero-emission vehicles (ZEVs). It is important to note that Oregon's freight hauling industry currently lacks viable ZEV options for applications such as tow trucks, long haul, heavy haul, emergency vehicles, snowplows and fuel tanker trucks. Carson operates 70+ double-shifted class 8 tanker trucks with a gross combined weight (GCW) of 105,500 pounds over mountain passes and in extreme temperatures. ZEVs are presently not available for over 85,000 GCW and lack the ability to haul effectively over passes or at low temperatures.

Additionally, the largest barrier is the fact there is no truck charging infrastructure in Oregon metro areas or statewide, making the ACT's current implementation timeline unobtainable.

Additionally, there is:

- Lack of clarity or guidance on exemptions due to operational safety concerns. Carson transports fuel for organizations including ODOT, OSP, fire departments, hospitals, data facilities, farmers, and manufacturers. Utilizing an electric battery-powered tanker truck presents considerable fire risk and is not an option.

- The replacement of older tucks is an ongoing priority for Carson. Sales limitations on Internal combustion engine (ICE) trucks are already an issue due to lack of sales of ZEV trucks to make percentages. This limits our ability to purchase new more efficient ICE engine trucks and prolongs our use of older, higher-emission vehicles.

Furthermore, the analysis of renewable diesel usage and its environmental benefits

as an alternative alongside ZEV units has not yet been addressed. Using existing infrastructure, more efficient combustion engines, and renewable diesel use may outperform ZEV adoption economically and environmentally for Oregon in the short and long term.

Renewable diesel-run ICE trucks should be considered in ACT and Low NOx Omnibus rulemaking. This option can significantly support Oregon's carbon emission reduction goals in the transportation sector, is cost-effective for businesses, and has minimal cost impact on residents.

Several states that had intended to adopt ACT have decided to postpone its adoption until 2027 due to its economic impact. We urge this committee to support HB 3119, delaying the ACT regulation in Oregon, and advance it for House consideration.