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Oregon State Legislature
House Committee on Climate, Energy, and Environment 900 Court St. NE
Salem, Oregon 97301

January 30, 2025

RE: Comment in Opposition to House Bill 3119 (2025)

Chair Lively and Committee Members,

We write today in opposition to HB3119 to delay the adoption of the Advanced Clean Trucks rule until 2027.

RMI is an independent, nonpartisan, nonprofit that works to transform global energy systems through market-driven solutions to secure a clean, prosperous, zero-carbon future for all.

In the United States, the transportation contributes more greenhouse gas (GHG) emissions than any other sector. Medium- and heavy-duty (MHD) trucks account for only 10 percent of vehicles on the road, yet produce almost a quarter of the sector's emissions, it's clear that truck electrification will be critical to meeting climate goals. RMI analysis predicts trucking demand is expected to grow by two-thirds through 2050.

Pollution from medium- and heavy-duty diesel trucks is a significant contributor to poor air quality. Electric medium and heavy-duty trucks are a critical way to reduce transportation emissions and improve environmental health.

Advanced Clean Trucks is a strong pathway to modernize trucking in Oregon and RMI applauds the state's leadership on this issue and encourages strong implementation. ACT provides certainty to the market to move the industry forward and help the state reap the benefits.

Electric trucks are increasingly viable for a wide range of use cases. They are simpler to produce and maintain, operate with greater energy efficiency, and benefit from rapidly declining costs as the industry progresses. Battery prices, the most significant cost component, have dropped 30% over the past five years, despite surging demand.

Drivers appreciate the smooth acceleration, quiet operation, and lack of harmful pollution, while fleet operators are learning to optimize the cost of charging through strategies like midday charging and taking advantage of lower electricity costs during off-peak hours, and

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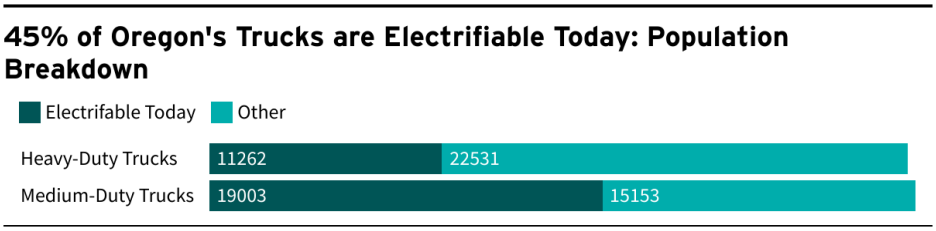
through on-site solar and battery storage. Drivers we have interviewed reported that electric trucks made the job more manageable and less physically demanding. They came home more energized and some said they would not need to prematurely retire.

The Advanced Clean Truck rule requires that 10-13% of trucks sales be zero emissions in 2026 but RMI analysis, using real-world truck telematics, data shows **45% of Oregon's medium and heavy duty vehicles are electrifiable today[1]—a figure expected to rise significantly as battery ranges improve.** Therefore, the requirements are achievable in Oregon, which has the opportunity to be a leader in this space. Oregon's trucking fleet is mostly comprised of medium-duty trucks that travel short to medium distances, usually within urban centers. Of the 67,949 trucks in the state, 33,793 are heavy-duty vehicles, while 34,156 are medium-duty vehicles. These trucks are concentrated around the urban corridor or Portland, Salem, and Eugene, especially in Multnomah, Washington, Clackamas, Marion, and Lane Counties. The state's HD trucks travel an average of 195 miles per day, while its MDs trucks travel an average of 103 miles daily.

There are a total of 30,265 electrifiable trucks in Oregon today which can be broken down into 19,003 medium-duty and 11,262 heavy-duty electrifiable trucks. These electric trucks would account for 147 million miles traveled annually, which make up 23 percent of the annual truck miles in the state.



Transitioning to electric trucks would also have a tremendous impact on Oregon's air quality and public health. Analysis by RMI found improvements in air quality from truck electrification would help **avoid asthma cases and air quality-associated mortalities and will result in an associated $31 million reduction in state healthcare spending per year.**

[1] RMI defines trucks electrifiable today as vehicles that travel 300 miles or less and return to a fixed base 95% of the time. This is from 2019 telematics data in RMI's Advanced Clean Trucks Dashboard

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The analysis discussed in this comment can be found in RMI's Advanced Clean Trucks Dashboard, an interactive tool that evaluates electrification opportunities and needs for trucks for stakeholders.

For these reasons we request a no vote on HB3119. Thank you for the opportunity to speak about this important issue and the benefits electric trucks can bring to operators, our communities, and planet.

Sincerely,

Olivia Alves
US Program
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Ari Kahn
Carbon Free Transportation
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