



July 23, 2024

Honorable Jeff Roy, House Chair
Joint Committee on Telecommunications, Utilities and Energy (TUE)
State House, Room 42
Boston, Massachusetts 02133

Honorable Michael Barrett, Senate Chair
Joint Committee on Telecommunications, Utilities and Energy (TUE)
State House, Room 109D
Boston, Massachusetts 02133

RE: Support Section 118 of Senate Bill 2829, Relative to the EVICC and Medium- and Heavy-Duty Infrastructure

Dear Chair Barrett, Chair Roy and Members of the Conference Committee:

On behalf of the Trucking Association of Massachusetts (TAM), I am writing in strong support of Section 118 of Senate Bill 2829, relative to the Electric Vehicle Infrastructure Coordinating Council and the consideration of medium- and heavy-duty trucking needs. With the still emerging state of technology surrounding alternative-powered trucking and the lack of suitable infrastructure, it is imperative we begin to fully address both sides of this issue. Section 118 of SB2829 begins to bring our infrastructure needs into clearer focus, but with particular attention to a segment of the transportation industry that is often overlooked.

As you know, the Electric Vehicle Infrastructure Coordinating Council (EVICC) was established pursuant to Section 81 of Chapter 179 of the Acts of 2022 to develop strategies resulting in an equitable, interconnected, accessible and reliable electric vehicle (EV) charging network in Massachusetts. EVICC is required to report on these strategies to the legislature through a formal assessment submitted every two years, starting in August 2023. Each assessment must contain but is not limited to the review of the present condition of, and future needs for, road and highway electrification; the estimates of the number and type of electric vehicle charging stations in public and private locations; among the variety of considerations relative to electric vehicle charging. The next assessment is due in August 2025.

As trucking in Massachusetts deliver 93% of all goods in the Commonwealth, a greater focus is needed on the coordination of meeting the often-shifting standards being put on the industry with respect to medium and heavy-duty trucking. As currently configured, the EVICC is largely focused on the electrification of the automobile market. While there is passing reference to medium- and heavy-duty (MHD) trucks, medium and heavy-duty trucking is not even a specifically identified focus nor its users identified as a stakeholder for outreach and input in its enabling act. Section 118 of SB2829 begins to remedy this lack of attention – which is essential if the Commonwealth wants to make reasonable progress on this matter.

To that end, under Section 118 of Senate Bill 2829, the EVICC would be specifically required to consider the realities associated with the implementation of policies necessary to bring zero emissions, MHD trucks to the Commonwealth. Specifically, the EVICC would be required to provide estimates of the number of zero-emission MHD truck charging stations required to meet the commonwealth's emissions limits and sublimits pursuant to said chapter 21N and provide a discussion of costs, permitting processes and estimated timelines for installing charging stations for medium- and heavy-duty vehicles.

Why is this language important? National Grid in its report, "The Road to Transportation Decarbonization: Understanding Grid Impacts of Electric Fleets", notes "[f]leet operators may also use larger electric vehicle supply equipment (EVSE) than in public, work, or residential charging applications. This means that, even if overall charging times were shorter, the amount of electricity demand at any given point in time could be higher. *These individual fleet sites could quickly become megawatt-scale loads. MHDVs (medium & heavy-duty vehicles) will also likely require more energy (kWh) per charging session, due to larger battery sizes and greater VMT.* The scale of MHDV charging needs means that MHDVs will represent a significant portion of the overall electricity demand from electric vehicles ... *the scale and scope of full fleet electrification pose new challenges for utilities and system operators.*" (See: <https://www.nationalgridus.com/media/pdfs/microsites/ev-fleet-program/understandinggridimpactsofelectricfleets.pdf> (Page 6)(Emphasis added).

Accordingly, the language of Section 118 of Senate Bill 2829 will simply increase the amount of attention needed to ensure we have properly identified the increased needs for electric infrastructure that the trucking industry will require to convert its fleet to electric vehicles. Given the competing yet related concerns between vehicle technology and infrastructure, this language simply ensures that the EVCC specifically works to ensure the transition for MHD truck users is both realistic and attainable. In short, Section 118 of Senate Bill 2829 focuses attention on a problem that exists today and, if not recognized specifically, could set back emission reduction efforts in the future.

I appreciate your consideration of this important matter and respectfully request that you include Section 118 of Senate Bill 2829 in the final conference committee report. If you have any questions or concerns, please do not hesitate to let me know.

Sincerely,



Kevin Weeks
Executive Director
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Cc:

Honorable Cindy Creem, Senate Majority Leader
Honorable Bruce Tarr, Senate Minority Leader
Honorable Richard Haggerty, House Vice Chair, TUE
Honorable Brad Jones, House Minority Leader