

Statement of Joseph R. Sculley
President
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Before
Governor's Council on Climate Change
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Good afternoon, I am Joe Sculley, president of the Motor Transport Association of Connecticut (MTAC). I appreciate having the opportunity to speak today.

The reason for my testimony is to respectfully ask the Council to ensure that they have properly accounted for federal regulations that will clearly have an impact on Green House Gas (GHG) emissions reductions in Connecticut. Any pertinent regulations not accounted for could result in policy recommendations from the Council that could be more aggressive than necessary.

The trucking industry as a whole realizes that we must take care of our environment. That is why the industry has actively worked with the Environmental Protection Agency (EPA) and the National Highway Traffic Safety Administration (NHTSA) as the agencies crafted rules geared at improving fuel efficiency and reducing Green House Gas (GHG) emissions from commercial trucks. The industry did not attempt to simply prevent the rules from taking place, but instead provided input on industry practices, so that regulators could write rules in such a way as to maximize their effectiveness.

Accordingly, we also recognize the Council's important role in working to ensure that the State of Connecticut complies with statutorily mandated emissions reductions goals. MTAC wishes to continue the approach taken by trucking industry experts based in DC who provided input to EPA/NHTSA. I hope my comments today will accomplish that.

One of the regulations the industry participated in crafting is the recently finalized joint Environmental Protection Agency / National Highway Traffic Safety Administration (NHTSA) rule governing emissions reductions and fuel efficiency for medium- and heavy-duty vehicles. In the trucking industry, this is often referred to as the Phase 2 rule, because it follows a previous joint rulemaking from the agencies on the same issue.

The EPA says the Phase 2 rule will cut CO2 emissions by approximately 1.1 billion metric tons. This is a huge benefit, but as of now, this benefit is not being accounted for by the Council as it works to finalize its "reference case." (*Examples of rules and policies not included are state-*



specific energy efficiency programs that are in the planning stages and EPA's recently proposed heavy-duty vehicle GHG standards.”)

http://www.ct.gov/deep/lib/deep/climatechange/gc3_adm_group/reference_case_table.pdf

I understand that this might be because the Phase 2 rule was due to be finalized after the Council's initial target date for publishing potential recommendations. After speaking with DEEP staff, I further understand that the Council does not plan to “go back” in order to incorporate the Phase 2 rule into the reference case, but would account for the rule in “mitigation measures.”

I urge the Council to reconsider the decision to not account for the Phase 2 rule in the reference case. If for some reason this is not possible, I believe the Council should clearly detail exactly how the mitigation measures would account for the rule.

Please note that the Phase 2 rule covers more than just heavy duty commercial trucks. It also applies to heavy-duty pickup trucks, vans, and vocational vehicles. Accordingly, local reductions in Particulate Matter (PM) emissions and Nitrogen Oxide (NOx) emissions will result from burning less fuel.

Because of this rule, by 2050, heavy-duty pickup trucks and vans will realize a total downstream GHG emissions reduction of 11.7%, vocational vehicles will realize a reduction of 16.1%, and tractor-trailers will realize a reduction of 23%. Overall, this amounts to a 20% GHG (CO₂, CH₄, N₂O) emission reduction by 2050.

EPA estimates indicate that much of the emissions reductions from this rule will be realized before 2050. By 2040, the GHG emissions reductions will be 11.2% / 14.9% / 21.3% / 18.5%, respectively.

While it is probably not possible to determine benefits specific to Connecticut, I think it is safe to say that the scope of this rule will have significantly positive environmental impacts for Connecticut.

While this rule is often referred to as the “heavy-duty vehicle GHG standards” rule, it will impact small business motor carriers in Connecticut who operate not only heavy-duty tractor-trailer combinations, but vocational trucks and pickup trucks. The impacted stakeholders are not simply large, national freight carriers. Small businesses might struggle to deal with the increased costs to purchase new equipment as a result of the rule. Accordingly, the State of Connecticut must ensure that it does not place any unnecessary additional financial burdens on Connecticut small businesses as a result of the reference case built by the Council.

Please ensure that the full scope of benefits of the EPA/NHTSA rule are reflected in the Council's recommendations.

Thank you for your consideration.