



May 9, 2022

Northeast States for Coordinated Air Use Management (NESCAUM)  
on behalf of the signatories of:  
Multi-State Medium- and Heavy-Duty Zero-Emissions Vehicle MOU

Attn: Jamie Flynn, Senior Policy Advisor

Re: Draft Multi-State Medium- and Heavy-Duty Zero-Emission Vehicle Action Plan

Ford appreciates the opportunity to comment on the Draft Multi-State MHD ZEV Action Plan, issued March 10, 2022. At Ford, combatting climate change is a human rights issue and a strategic priority for our company, and we're proud to be the only full-line American automaker committed to doing our part to limit global temperature increases consistent with the Paris Climate Agreement while advocating for one national standard to set us on a path to a zero-emissions transportation future. Ford seeks to achieve carbon neutrality globally no later than 2050 across our vehicles, our suppliers, and our facilities. We believe that making great high-performance vehicles, protecting the environment, and maintaining a strong business depend on each other.

We applaud the Multi-State Medium- and Heavy-Duty (MHD) Zero Emission Vehicle Task Force and NESCAUM's efforts to identify barriers and prioritize opportunities in electrifying MHD vehicles. The Multi-State MHD ZEV Action plan focuses on providing an equitable transition to MHD ZEVs, prioritizing deployment in frontline and overburdened communities disproportionately impacted by air pollution and climate change.

Ford is leading the Electrification Revolution with our iconic nameplates like the F-150 Lightning, the Mustang Mach-E, and in this MHD segment with the fully electric e-Transit van. We're investing more than \$50 billion in electrification by 2026, and our recently announced Blue Oval City Mega Campus and BlueOvalSK battery park will create 11,000 US jobs and power the future of EVs. In addition, we've restructured our business into distinct automotive units to accelerate our product transformations. Specifically, Ford Model e will accelerate innovation and delivery of breakthrough electric vehicles at scale, and Ford Pro will deliver new levels of productivity for business and government customers via work-ready products and services.

Ford supports proposals that encourage the production of zero-emissions vehicles and, in general, the Task Force's proposed recommendations for state policymakers to promote the rapid, equitable, and widespread deployment of MHD ZEVs. We believe

that coordinated effort by all parties is critical to a successful acceleration of MHD ZEVs, aligned with the more than 60 recommendations defined in the Action plan.

As states are implementing the framework identified in this MHD ZEV Action Plan, it is critical to ensure all stakeholders have clearly defined targets, and that all parties are working together in on the path to electrification. Achieving the pace and scale of ZEV adoption needed to meet the task force's electrification goals will require well designed public policies and programs and a coordinated effort by all stakeholders to address market barriers, such as the need for charging and fueling infrastructure, incentives to offset higher up-front purchase prices of vehicles, and electricity rates designed to support commercial fleet needs.

Taken together, the elements of this framework are all needed to achieve a zero-emissions future. Government, industry, and consumers must all collaborate to achieve these ambitious goals. Electrification in this MHD space will have unique challenges; the commercial vehicle market has many distinct segments which require unique vehicle configurations and capabilities. Last-mile delivery vehicles, shuttles, and busses which travel predictable daily routes have seen success for early transition to EV, however additional development is needed for zero emissions technologies in various segments such as Class 7 and 8 heavy-haul and long-haul applications.

Ford has aggressive plans to transition our product offerings to zero emissions. Data shows that sales mandates alone are ineffective at driving EV adoption, and that sales success depends on addressing barriers to affordability and charging availability. Accelerated adoption of EV's requires coordination between OEMs, energy providers, state agencies, and commercial fleet customers. As product offerings and range are becoming more appealing to consumers, our focus must shift to addressing concerns with initial cost of technology, EV charge rates and charging availability, green grid transitions and infrastructure robustness.

Ford is committed to sustainability leadership, and to being fully carbon neutral worldwide no later than 2050. We are doing our part and making our most iconic vehicles electric, and additionally we were awarded funding from the Department of Energy SuperTruck 3 program to develop and demonstrate hydrogen fuel cell electric Class 6 Super Duty trucks, while targeting cost, payload, towing, and refueling times equivalent to conventional gasoline trucks. Critical to a successful transition are federal and state complimentary measures supporting electrification, such as:

- Purchase incentives to accelerate the transition to EVs, and to achieve the President's goal of making half of all vehicle sold in 2030 electric vehicles. This could include a nationwide low carbon fuel standard (LCFS) program, funding consumer EV incentives as in California's Clean Fuels Reward program.
- Actions to encourage public transit and fleet zero emission MHDV deployment
- EV charging infrastructure policy (residential, workplace, and public facilities)
- Policies to support development of EV and battery manufacturing and domestic supply chains, including critical minerals, and development of a battery and EV recycling system in the United States.

- Consumer education programs
- Continued actions and commitments by automakers to improve the availability, variety, and affordability of EVs in the United States. Together, we can accelerate to a zero emissions future.

At Ford, we will do our part by developing highly efficient and zero-emission vehicles – and combine that with our legendary ability to build them at scale. We look forward to a collaboration with all parties during this transformation to zero-emissions.

Please contact me if you have any questions. Thank you for your consideration, and the opportunity to provide comment on this Draft Multi-State MHD ZEV Action Plan.

Marisa Anderson  
Ford Motor Company  
mander51@ford.com