Comments of the American Council for an Energy-Efficient Economy (ACEEE) on the "Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards" Proposed Rule
(Docket ID No. EPA–HQ–OAR–2025–0194)
September 2025

The American Council for an Energy-Efficient Economy (ACEEE) appreciates the opportunity to comment on the Environmental Protection Agency's (EPA) proposed rule for the Reconsideration of 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards. ACEEE is an independent nonprofit organization dedicated to advancing energy efficiency policies, programs, technologies, investments, and behaviors. ACEEE aims to build a vibrant and equitable economy that uses energy more productively, reduces costs, protects the environment, and promotes public health and safety.

ACEEE's comments below primarily speak to the proposed rollbacks of the greenhouse gas (GHG) vehicles standards for light-, medium-, and heavy-duty vehicles. If EPA has any questions, please do not hesitate to contact us at transportation@aceee.org.

GHG standards protect families and the economy

ACEEE opposes the repeal of the GHG standards for light-, medium-, and heavy-duty vehicles in the GHG portion of EPA's Multi-Pollutant Emissions Standard for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles as well as the repeal of Phase 3 Greenhouse Gas Emissions Standards for Heavy-Duty Vehicles. These repeals would *increase* transportation costs for American consumers as well as increasing health costs due to air pollution. It is imperative to reduce GHG emissions to avoid the worst impacts of climate change. Repealing these standards would worsen climate change impacts that already cost U.S. families and businesses billions of dollars each year through damage from extreme weather, higher food prices, and increased health costs (USGCRP 2023).

Light-duty vehicles such as passenger cars and pickup trucks account for approximately 50% of transportation GHG emissions in the United States (EPA 2024a). Furthermore, medium- and heavy-duty (MDHD) vehicles, despite constituting a small share of vehicle miles traveled on the road (~10%), are responsible for a disproportionately greater amount of transportation GHG emissions, at 23% of GHG emissions (EPA 2024a).

The vehicle standards EPA adopted in 2024 are projected to provide billions of dollars in economic benefits annually. The light- and medium-duty vehicle standards are expected to deliver roughly $85 billion in annualized benefits, including $72 billion from avoided climate damage and health-related costs (EPA 2024c). The Phase 3 GHG standards for heavy-duty vehicles (HDVs) are expected to add another $13 billion in annualized net benefits (EPA 2024b). Rolling back these standards would forfeit these savings, pass higher costs on to American families and consumers, and hurt the economy.

American consumers are projected to see more than $2 trillion of savings through 2050 from just the light-duty vehicle GHG rule (Harto 2024). Analysis by Consumer Reports shows that consumers also stand to benefit from cheaper cars, with the average new vehicle in 2032 expected to cost over $10,000 less over its lifetime than the average 2022 vehicle due to savings on fuel and maintenance (Harto 2024). In total, the loss of these GHG standards would forgo billions of dollars of savings projected due to reductions in operational and maintenance costs, with light-duty drivers expected to save $16 billion and the heavy-duty industry expected to save $3.5 billion (EPA 2024b; EPA 2024c). Furthermore, loss of the GHG standards also risks the jobs of tens of thousands of workers in the clean vehicle industry, an industry that employed almost 400,000 people at the end of 2024 (E2 2025). Additionally, repealing

these rules also risks the thousands of announced and forthcoming EV manufacturing jobs (~61,000 for light- and 8,000 for MDHD vehicles) (Bluegreen Alliance Foundation 2025).

The U.S. continues to see consumer interest in purchasing cleaner vehicles

Contrary to EPA's concerns presented in the proposed rule repeal regarding a lack of consumer interest in EVs (C-13), consumer demand for cleaner vehicles is strong and growing (FR 36313). Light-duty EV sales have surged in recent years, increasing from a few percentage points of overall sales before 2020 to almost 15% in 2024 (EPA 2025b). This demonstrates the strong demand among consumers for clean and affordable vehicles and shows that EVs can meet consumers' needs. EVs, however, are not the only growing technology that can significantly reduce emissions from light-duty vehicles. Hybrids reached a new high of almost 15% of sales in 2024, up from less than 5% only a few years ago (EPA 2025b).

In a recent survey, one-third of Americans said they were very or somewhat likely to seriously consider purchasing an EV as their next vehicle and 45% of Americans said they would seriously consider a hybrid vehicle, showing their popularity (Kennedy, Kikuchi, and Tyson 2025). Automakers have also demonstrated their support each year by collectively offering more EV models each year than the year before. There are now over 100 models available to purchase in the United States today, and 65% of Americans have a battery electric vehicle available in the category in which they shop, be it a compact car, crossover, or pick-up truck (ANL 2025).

With MDHD EVs experiencing a similar increase in interest, EPA's concerns about slow fleet turnover in Section V (C-13) ignore the full picture (FR 36313). Regarding slow fleet turnover concerns from increased prices of battery electric vehicles, the proposal fails to consider the role of non-federal funding in supporting EVs. Private companies, utilities, states, and local governments have invested $9 billion to date for medium- and heavy-duty vehicle charging infrastructure (Atlas Public Policy 2025). This includes $4 billion from private entities, $2 billion from utilities, and $3 billion from state and municipal governments.

In addition to EV chargers, private entities and state and local agencies have also shown tremendous interest in deploying medium- and heavy-duty EVs. An electric fleets deployment and commitment list by the Environmental Defense Fund shows that more than 286,000 EVs (classes 2b and up) have been ordered and deployed (EDF 2025). At least 15 states have awarded $476 million for clean freight trucks (EVs and chargers) through a variety of funding and incentive programs, such as the Volkswagen Settlement Funds and state-level truck voucher programs (ACEEE 2024; Atlas Public Policy 2024).

For all vehicle classes, efficiency gains and hybrid technologies can help automakers meet strong GHG standards

EPA's proposed rule claims that the GHG rules "mandate an increased and faster shift from gasoline-fueled vehicles to electric vehicles," ignoring the role of non-EV technologies in helping achieve the GHG emissions standards (FR 36306). In fact, EPA's discussion around "relative efficiency and emission reductions achieved by newer vehicles" in Section V, which the agency requests comments on, appears to be limited to battery and fuel cell electric vehicles (FR 36313). Hybrid technology as well as other efficiency improvements can help automakers achieve both the light- and medium- as well as heavy-duty GHG standards.

Traditional hybrid technology can significantly reduce GHG emissions for light-duty vehicles without full electrification. These hybrids do not require a plug but include a battery that is charged with regenerative breaking and that can potentially propel the vehicle without engaging the engine.

Traditional hybrids can emit 30% fewer GHG emission than their conventional counterparts, according to one estimate (O'Malley and Slowik 2024). These are not insignificant savings, and greater adoption of hybrids can deliver big improvements in air quality and save drivers considerably at the pump. Hybrid vehicles are also a very cost-effective strategy to reduce emissions. Hybrid vehicles cost on average $1,700 more than their traditional gasoline counterparts, but these costs are recouped through lower fuel spending and lower repair and maintenance costs. The time it takes to recoup the higher upfront cost is generally 4 years or less (Keith 2025).

Similarly, the Phase 3 GHG heavy-duty vehicles rule presented an alternative option for how manufacturers can achieve the final rule without relying on EVs through improvements to internal combustion engine vehicles (EPA 2024b). The Phase 3 HDV rule can be achieved through technologies that are cost-effective and can pay for themselves within two years (Ragon et al 2023). For example, cost-effective efficiency improvements to sleeper cabs can result in a 23% emissions reduction beyond the previous Model Year 2027 standards through weight reduction, aerodynamic improvements, and reduced tire rolling resistance.

EVs can improve grid resiliency and put downward pressure on electricity rates

Finally, the EPA also requested comments on "all aspects of the draft RIA" (FR 36327). EPA's discussion of the power sector in the draft regulatory impact analysis argues that repealing the GHG standards will improve reliability of the electric sector (due to reduced EV demand) (EPA 2025a). However, this argument ignores the increasing role of managed charging, time-of-use (TOU) rates, and vehicle-to-grid technologies for light-, medium-, and heavy-duty vehicles.

Vehicle-to-grid technologies are especially suited for MDHD EVs and electric school buses. Early vehicle-to-grid school bus pilot projects demonstrate the grid benefits that electric buses can provide by sending electricity back to the grid during peak demand and thereby reducing the stress on the grid (Hutchinson and Kresge 2025). Light-duty EVs can also contribute to the stability of the grid while putting downward pressure on electricity rates. EVs are increasingly charged during times when the grid has extra capacity because of the proliferation of TOU rates, which charge different rates depending on certain conditions. For example, the rate may be lower overnight when demand on the grid is lowest or during the middle of the day when abundant solar energy makes electricity cheap and plentiful. TOU rates and other forms of managed charging can help stabilize the grid and increase utility revenue without requiring additional infrastructure investments, therefore putting downward pressure on rates (Shenstone-Harris et al. 2024).

The United States needs strong EPA GHG standards

EPA's technical bases for the proposed repeal of these rules are insufficient and overlook many key aspects: consumer interest in EVs continues to drive investment in the industry, GHG emissions can be reduced through hybrid technologies and improvements to vehicle efficiency, and EVs can contribute to grid stability instead of undermining it. The 2024 rules are projected to save billions of dollars in vehicle operation costs, making cars more affordable, all while supporting tens of thousands of jobs across the nation. Climate change is already making natural disasters worse and extreme weather more frequent, damaging our economy and hurting families' pocketbooks. Rising temperatures would also lead to worsening health outcomes, including increased incidences of asthma, cancer, and other chronic illnesses. Repealing these rules will set back economic, climate, and health benefits for families in the United States. ACEEE thus urges the EPA not to repeal the GHG standards currently in place for light-, medium-, and heavy-duty vehicles.

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