







October 20, 2023

Good Morning. My name is Ashley Porter and I am here today representing TEC Equipment the West Coasts Largest Volvo and Mack Dealership. Thank you for the opportunity to speak on the California's Air Resources Board (CARB) recent regulatory activity regarding the Proposed Amendments to the Heavy-Duty Engine and Vehicle Omnibus.

The current Omnibus regulation amendments have established an aggressive timeline that requires our Manufactures to certify a California Carb Compliant engine with a knox requirement that is half of what the current EPA regulations are.

I am the sales manager for the heavy-duty trucks sales department in Oakland, the majority of our customers are within the vocational, refuse and municipality segment. With the current regulations we are limited in the make and model of trucks that will meet our customers needs. The current regulations limit the trucks to be either Natural Gas or Electric. Both present significant challenges to these markets. I am confident our manufacturers are working fervently to meet the requirements of the new regulations as well as the demands of the vocational, refuse and municipality truck market, the fact of the matter is we are not there yet and need more time.

I would like to highlight the challenges these regulations present to our refuse, vocational and municipality customers. Currently our refuse customers run 8-10 hour shifts and have aggressive sustainability goals to meet. The CNG for the refuse fleets are produced from a closed loop carbon negative circle. They are sorting the garbage, organics and green waste and putting them into aerobic or anti aerobic digesters to produce the Natural gas that fuels their fleet. Moving to a ZEV fleet is taking these companies from a carbon negative position to a carbon positive position. Moving to ZEV will take the organic, green waste and recycling used to produce Natural gas into the landfill. In the coming year our refuse customers are facing significant challenges with the availability of trucks, cost and infrastructure needed to meet these requirements.

The trucks used for our vocational customers; dirt, concrete, municipality, under the new Omnibus regulations are faced with the fact that CNG and electric are not capable to perform the tasks that their current ICE trucks are doing. These









trucks spend hours in the field producing concrete and asphalt for the infrastructure of California. During the time of crisis, earthquake wildfire these are the trucks that are providing power to our communities, cleaning up the disaster areas and helping to keep our communities safe.

The challenges our customers are facing because of the current Omnibus regulations has a direct effect on the lively hood of our dealership and our employees. Year to date there has been close to 2,000 trucks registered in the Northern California market. With the new regulations we are expecting to see this number drop by 75-80%. This presents a significant economic hardship for our dealership and customers. Everything we do or see is touched by a Truck.

This is just a small glimpse into how the Omnibus regulations is affecting our customers and dealership. I ask that you take everything that has been presented today into consideration and delay the omnibus regulations to fit the timeline of the EPA. This will give our manufacturers the time needed to improve the technology to meet the demands of all the segments of trucking.

We are committed to and support CARB's commitment to the transition to zeroemission medium and heavy-duty vehicles. However, it presents an urgent and significant threat to our business and the business of our customers.

Thank you for your time today!

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