

**EPA Light- and Medium-Duty Multipollutant Rulemaking
EO 12866 Meeting Between Alliance for Automotive Innovation and OIRA
February 14, 2023**

Key Points Leave Behind

Resources

- [The Future Is Electric: Let's Drive Together](#)
- [Get Connected: Electric Vehicle Quarterly Report](#)
- [Reading the Meter: State of the Automotive Industry Report](#)

Electric Vehicle (EV) Transformation

- Automakers are committed to the EV transformation, investing over \$100 billion in the U.S. and growing.
- The next 5-10 years will be a key period of the transformation as automakers develop the necessary supply chains, charging infrastructure is developed, and other enabling conditions are put in place.

Assessing EPA's Proposal

- A feasible and practicable rule requires multiple enablers outside of automaker's direct control.
- The proposal needs to evaluate:
 - Critical mineral supply needed vs. availability to support the projected level of electrification in a global context for each year of the proposed rule.
 - EV affordability based on likely technology pathways, supply chain economics, and government support.
 - EV charging infrastructure quantity, type, and deployment to support projected EVs.
 - The available capital for investing in ICEs, and the complications of doing so, while also building the necessary supply chains and manufacturing facilities for EVs.
 - If more stringent emission standards than the California ACC2 program are proposed, EPA should consider the costs and benefits of such standards relative to an ACC2-based approach.

Policies to Reduce Risk and Uncertainty in an EV-centric Rule

- A shorter time period would reduce risk and uncertainty, and potentially align better to related rulemakings.
- Consider regulatory pathways that will encourage automakers to help address EV-enabling conditions that are outside of their traditional purview (e.g. infrastructure investments).

Multiple Rulemakings

- The Administration is conducting multiple related rulemakings.
- Automakers need the opportunity to understand the rules in a coordinated fashion.
- Additional time may be required to respond to multiple complex, overlapping, and related proposals released on different timelines.