



August 23, 2023

Commissioner Dykes
CT Department of Energy
& Environmental Protection
79 Elm Street
Hartford, CT 06106

RE: Support for Connecticut's adoption of the Advanced Clean Cars II regulation

Dear Commissioner Dykes:

Consumer Reports (CR) thanks you and your department for commencing rulemaking proceedings on Connecticut's adoption of the Advanced Clean Cars II (ACC II) regulation. The ACC II rules will provide clean, cost-saving transportation choices for consumers, and we write to you today to express our strong support for Connecticut's adoption of these critical rules before the end of 2023.

Founded in 1936, CR is an independent, nonprofit and nonpartisan organization that works with consumers to create a fair and just marketplace. Known for its rigorous testing and ratings of products, CR also advocates for laws and corporate practices that are beneficial for consumers. CR is dedicated to amplifying the voices of consumers to promote safety, digital rights, financial fairness, and sustainability. The organization surveys millions of Americans every year, reports extensively on the challenges and opportunities facing today's consumers, and provides ad-free content and tools to 6 million members across the United States. Connecticut is also home to CR's Auto Test Center (ATC) where we test about 50 vehicles annually, including clean fuel vehicles, on functions such as reliability, fuel economy, safety and usability.

Electric vehicles (EVs) provide significant cost savings for consumers, and a strong Zero-Emission Vehicle (ZEV) program will help maximize the number of Connecticut constituents who can realize this benefit. Our analysis¹ shows that today's mainstream EVs significantly lower the total cost of ownership for consumers, which allows consumers to save money:

¹ Consumer Reports, Electric Vehicle Ownership Costs: Today's Electric Vehicles Offer Big Savings for Consumers, Chris Harto, [October 2020](#).

- Owning an EV will save the typical driver \$6,000 to \$10,000 over the life of the vehicle, compared to owning a comparable gas-powered vehicle.
 - The average EV driver will spend 60% less to power their vehicle than the owner of a similar gas-powered vehicle.
 - EVs cost half as much to repair and maintain as similar gas-powered vehicles.

Under ACC II, we expect to see a rapid and sustainable deployment of new ZEV and Plug-In Hybrid Electric Vehicle (PHEV) models, increasing affordable consumer options for clean vehicles in the marketplace. This program will encourage the sale of ZEVs which will lead to significant emission reductions and provide consumers with wide-ranging choices from a broad mix of ZEV and PHEV technologies across all passenger vehicle categories. By setting strong targets for auto manufacturers to sell clean vehicles in the state, these rules will continue to encourage ongoing innovation in the transportation sector that will offer consumers options that will save them money, reduce air pollution and greenhouse gas emissions, and improve public health, which is why it is imperative that CT Department of Energy & Environmental Protection (DEEP) act swiftly to adopt the ACC II rule.

Connecticut's adoption of the ACC II rule will ensure that consumers can access the zero-emission vehicles they want in their own state. This is a critical moment for Connecticut to join the wave of states moving towards a clean transportation future, and ensure that constituents can access the full range of economic and health benefits of the transition.

Failure to adopt ACC II in 2023 would mean that by 2030, there would be fewer ZEVs on Connecticut roads as the rule would not begin implementation in the state until 2028, at minimum. Delaying adoption would deprive residents of the ZEVs they would otherwise be able to acquire and the many important co-benefits ACC II provides. Furthermore, these rules provide strong consumer protections to ensure that vehicle manufacturers are providing reliable ZEVs and PHEVs, which is critical for consumers purchasing these vehicles on the secondary market. Since many Connecticut residents – particularly low-income drivers – purchase used vehicles, a delay in the rule means there would be fewer clean, affordable vehicles available for drivers in the secondary market.

Given the many benefits ACC II will bring to Connecticut, and because of the importance of proposing and adopting ACC II this calendar year, adopting ACC II should be a top priority for the state in 2023 and for CT DEEP. We strongly urge CT DEEP to

adopt ACC II rules swiftly, ensuring consumers in the state have greater access to clean, cost-effective mobility options.

Sincerely,

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