



American
Petroleum
Institute

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The Honorable Cathy McMorris Rodgers
Chair
House Committee on Energy and Commerce
2125 Rayburn House Office Building
Washington, DC 20515

The Honorable Frank Pallone
Ranking Member
House Committee on Energy and Commerce
2322 Rayburn House Office Building
Washington, DC 20515

Dear Chair Rodgers and Ranking Member Pallone:

The American Petroleum Institute (API) has significant concerns with the potential consequences of the Environmental Protection Agency's (EPA) proposed rule, "Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles." While API supports the goal of reducing emissions in the transportation sector, the EPA's current proposal eliminates opportunities for the marketplace to identify the most efficient, lowest cost opportunities to reduce greenhouse gas (GHG) emissions from new and existing vehicles and could create significant challenges in meeting America's transportation needs.

EPA's proposed rule infringes on consumer choice and, if implemented, would greatly restrict Americans' freedom to decide what vehicle best suits their transportation needs. Additionally, the proposed rule could have negative impacts on our nation's grid reliability due to the increase in power demand required for the electrification of a large portion of the U.S. transportation fleet. The proposed rule could also threaten America's energy security by forcing a greater reliance on foreign adversaries who dominate the critical mineral manufacturing and processing necessary to produce batteries for electric vehicles.

EPA data shows fuel and vehicle technologies have reduced emissions from common pollutants by roughly 99 percent in both light- and heavy-duty vehicles and buses compared to 1970,¹ and CO₂ emissions from light-duty internal combustion engine vehicles (ICEV) have decreased 25 percent since model year 2004.² Given the precedent of improvements in fuel and vehicle technologies, API is confident that even further emissions reductions can be made in transportation while avoiding the potential negative consequences from EPA's proposed rule.

On July 6, 2023, Representative Tim Walberg (R-MI-05) introduced *The Choice in Automobile Retail Sales (CARS) Act (H.R. 4468)*, which prohibits the EPA from finalizing standards for light- and medium-duty vehicles that restrict consumer choice, mandate certain technologies or limit vehicle options based on engine type. API supports *The CARS Act* and its goal of protecting consumer choice while providing Americans with the transportation options on which they depend.

API encourages members of the House Committee on Energy and Commerce to advance this critical legislation. On behalf of API's nearly 600 members that produce, process and distribute most of the nation's energy, we appreciate your consideration of this request.

Sincerely,

Amanda E. Eversole

¹ U.S. EPA, "History of Reducing Air Pollution from Transportation in the United States," <https://www.epa.gov/transportation-air-pollution-and-climate-change/history-reducing-air-pollution-transportation>, accessed June 2, 2023.

² U.S. EPA, "Highlights of the Automotive Trends Report," <https://www.epa.gov/automotive-trends/highlights-automotive-trends-report>, accessed June 2, 2023.