



# New Mexico Environment Department

## Large Entity Reporting Requirement (LERR) Webinar

Angela Raso  
*Permitting Section Manager*  
NMED Climate Change Bureau

May 19, 2025



# New Mexico Environment Department

## Large Entity Reporting Requirement (LERR)

### Rules of Engagement:

- If you have a question, please ask using the Q&A panel on your dashboard. Questions will be answered in the order they are received.
- We expect all participants to maintain a respectful and constructive demeanor during this meeting. Disruptive or inappropriate behavior may result in removal from the discussion.



# Agenda

- **Large Entity Reporting Requirement (LERR) Overview**
  - Background
  - LERR Overview
  - Office Hours
  - Resources
  - Who Needs to Report
  - Which Vehicles to Report
- **Reporting**
  - NMED Large Entity Reporting Spreadsheet
  - Organization Data
  - Facility Data
  - Vehicle Data, including VINs, and Analysis
  - Trade Secrets
- **Finalizing Reporting**
  - Report Submittal
  - Recordkeeping
  - Office Hours
  - Resources
- **Questions**



# Background

- Fossil fuel-powered transportation in New Mexico contributes to air pollution and greenhouse gas emissions in our state.
  - After the extraction and production of oil and gas, fossil-fuel transportation represents the second largest source of greenhouse gas emissions in New Mexico.
- Adoption of New Motor Vehicle Emission Standards (20.2.91 NMAC) on November 16, 2023
- The New Motor Vehicle Emission Standards helps ensure New Mexicans have access to zero-emission vehicles.
  - Zero-emission vehicles improve local air quality and decrease New Mexico's contribution to greenhouse gas emissions.
  - Unlike gasoline and diesel fuels, electric cars and hydrogen truck fueling stations do not have the potential to pollute critical water resources via leaks and spills.
  - Electric vehicles offer operators a lower total cost of ownership.
- Rules include a one-time reporting requirement for certain fleet owners and transportation providers, *i.e.* the Large Entity Reporting Requirement (LERR)



# LERR Overview

- Report Frequency: One-time only
- Deadline: July 31, 2025
- Applies to: Medium- and Heavy-Duty Vehicles
- Report Format: Large Entity Reporting(LER)  
[Spreadsheet](#)
- Report Includes:
  - Organization Information
  - Fleet Facilities
  - New Mexico Fleet Operation Characteristics
  - VIN list



# Office Hours

Show up to ask NMED questions:

Virtual Office Hours:

☐ 09:00 AM MT-10:00 AM MT

- ☐ May 20, 2025
- ☐ May 27, 2025
- ☐ June 3, 2025
- ☐ June 10, 2025
- ☐ June 17, 2025
- ☐ June 24, 2025
- ☐ July 1, 2025
- ☐ July 8, 2025
- ☐ July 15, 2025
- ☐ July 22, 2025
- ☐ July 29, 2025

Teams Meeting



# Resources

- Kayla Gustafson, *Clean Transportation Specialist*
  - 505-637-1704
  - [CleanCarsNM@env.nm.gov](mailto:CleanCarsNM@env.nm.gov)
  - Climate Change Bureau, New Mexico Environment Department
- Large Entity Reporting LER Spreadsheet
  - <https://service.web.env.nm.gov/urls/VKikbHRh>
- Background Resources
  - More info on LERR: <https://www.env.nm.gov/climate-change-bureau/large-entity-reporting-requirement/>
  - Subscribe to the Large Entity Reporting Topic under Climate Change Bureau to receive updates on this requirement:  
<https://public.govdelivery.com/accounts/NMED/subscriber/new>
  - View the Large Entity Reporting Regulation at 20.2.91.120 NMAC:  
<https://www.srca.nm.gov/parts/title20/20.002.0091.html>



# Who Needs to Report

Large Entity Reporting Requirement only applies to Medium- and Heavy-Duty Vehicles (MHDVs) which are vehicles with gross vehicle weight rating (GVWR) greater than 8,500 pounds.

Use the [flowchart](#) to confirm if you should complete a Large Entity Report.

## Fleet and Broker Entities

- Any entity with U.S. gross annual revenues  $>$ \$50 million for the 2023 or 2024 tax year, who operated a facility in New Mexico that had at least one MHDV under common ownership and control or that was operated in New Mexico in calendar year 2024 or through April 30, 2025
- Any fleet owner in calendar year 2024 or through April 30, 2025 that had  $\geq$ 50 MHDVs under common ownership and control and operated a facility in New Mexico
- Any broker or entity that dispatched  $\geq$ 50 MHDVs into or throughout New Mexico and operated a facility in calendar year 2024 or through April 30, 2025
- Any federal government agency or any state government agency, including all state and local municipalities, that had one or more MHDVs that were operated in New Mexico in calendar year 2024 or through April 30, 2025






















### Exclusions:

- K-12 Schools and school districts
- Emergency vehicles and military tactical vehicles
- Entities that do not operate facilities in New Mexico
- Any exempt fleet operator can optionally submit a report



# Which Vehicles to Report

- On-Road, Medium- and Heavy-Duty Vehicles (MHDV) (class 2b-8)
  - Vehicles with gross vehicle weight rating (GVWR) greater than 8,500 pound

			Pickups, Van-Passenger, Minivan, Van-Step, Utility Van	<b>Class 2B</b> (8,500 - 10,000 GVWR)
			Van-Passenger, Van-Step, City Delivery, Service Body	<b>Class 3</b> (10,001 - 14,000 GVWR)
			Box Dry Van, Box Reefer, Van-Step	<b>Class 4</b> (14,001 - 16,000 GVWR)
			Boom / Bucket, Flatbed or Stake Bed	<b>Class 5</b> (16,001 - 19,500 GVWR)
			School Bus, Flatbed or Stake Bed, Beverage Truck	<b>Class 6</b> (19,501 - 26,000 GVWR)
			Garbage Roll-Off, Off-Road Yard Tractor, Bus-Other, Tow	<b>Class 7</b> (26,001 - 33,000 GVWR)
			Tractor Day Cab, Tractor Sleeper Cab, Dump, Concrete Mixer	<b>Class 8</b> (33,001 and over GVWR)

\*Please note that these are examples, you must note the GVWR of your specific vehicles. One vehicle type may fall under multiple classes.

- Does not apply to lighter vehicles like cars and light-duty pick-ups
- Includes on- and off-road yard tractors
- Vehicles domiciled or registered in New Mexico, and vehicles that do the majority of their miles in New Mexico



# Reporting





# NMED Large Entity Reporting Spreadsheet

- Please download and fill the NMED Large Entity Reporting Spreadsheet to submit your report by July 31, 2025
- You can download the spreadsheet from NMED page: [Large Entity Reporting Requirement](#)

**All reporting entities are required to submit their reports by July 31, 2025. To report, email your Large Entity Reporting spreadsheet to [CleanCarsNM@env.nm.gov](mailto:CleanCarsNM@env.nm.gov).**

Download the Large Entity Reporting [spreadsheet here](#).

NMED is no longer using the LERR Portal.



# Data to Report - Organization

- ❑ Contact Information
- ❑ Primary NAICS Number
- ❑ Annual Revenue
- ❑ Broker/Motor Carrier authority
- ❑ USDOT Number
- ❑ IRP Number
- ❑ High-level information regarding:
  - Number of hired carriers for deliveries in NM
  - Corporate Sustainability Plan
  - Vehicles operating in NM with domiciles outside the state



# Organization Data – Brokers and Motor Carriers

- The following information is only required for organizations with brokerage and/or motor carrier authority
  - Number of subhaulers you contract with in New Mexico to transport goods/other property
  - Estimated number of vehicles operated by your subhaulers on your behalf in New Mexico
  - Estimated number of vehicles operated by your subhaulers that operate under your motor carrier authority in New Mexico



# Data to Report - Facilities

- ❑ Facility Name
- ❑ Address
- ❑ Contact person information
- ❑ Facility Type
- ❑ Lease or Owned
  - If not leased or owned leave blank
- ❑ Fueling Infrastructure
- ❑ Type of Trailers Pulled
  - If Yes, ensure that the Trailer Type Total adds to 100%
  - If No, leave fields blank

Trailer Types pulled									
(If you have tractor trailers on site, these columns should add to 100%)									
Do you have trailers on-site?	Van-Dry %	Van-Reefer %	Tanker %	Flatbed %	Shipping Container %	Low Bed %	Curtain Side %	Other % (please specify in facility comments)	Trailer Type Total %
Yes	50%	20%	0%	30%	0%	0%	0%	0%	100%



# Data to Analyze – Vehicle Categories

1. Pick a facility name (choices auto-populate from Facility tab)
2. Select your Vehicle Group Name (aka operational category, (i.e. Food or Beverage Distribution))
3. Select a vehicle body type (i.e. Van-Cargo)
4. Select the fuel type for that set of vehicles (i.e. Gasoline)
5. Select the weight class (i.e. Class 2B)
6. Note the total number of vehicles of this type, at this location (i.e. 5)
7. You now have one vehicle group category for your analysis.
  - This group is 5 Class 2B Gasoline Cargo Vans operating out of Las Cruces. All questions should be answers for how this group of 5 vehicles operate – on average – in Las Cruces.
  - Another group might be 16 Diesel Class 3 Cargo Vans in Albuquerque

**All report data is organized by these "vehicle categories" - i.e. you will analyze and report averaged data for the 5 Gasoline Class 2b Cargo Vans in Las Cruces and separately for the 16 Class 3 Diesel Cargo Vans in Albuquerque, not for the average statewide box van operations or for each individual box van at a site**



# Data to Analyze – Vehicle Categories

Beverage Truck	Concrete Pump	Pickup Bed	Water
Boom / Bucket	Crane	Service Body	Van-Cargo
Box Refer	Drill Rig	Sweeper	Van-Step
Box Dry Van	Dump	Tank	Van-Passenger
Bus - Shuttle	Flatbed or Stake Bed	Tractor Day Cab	On-Road Yard Tractor
Bus - Other	Garbage Front Loader	Tractor Sleeper Cab	Off-Road Yard Tractor
Car / SUV	Garbage Side Loader	Tow	Other - Please Specify
Car Carrier	Garbage Packer	Truck Refrigerated Unit	
Concrete Mixer	Garbage Roll-Off	Vacuum	



Facility Name	Vehicle Group Name	Vehicle Body Type	Weight Class Bin (Gross Vehicle Weight Rating Range)	Vehicle Fuel Type	Number of Vehicles
---------------	--------------------	-------------------	--	-------------------	--------------------

Regional Shipping
Drayage
Long-Haul Trucking
Parcel Delivery
Transit
Refuse / Waste Vehicles
School Bus
Food or Beverage Distribution
Towing
Shuttle Service
Cargo Handling
Construction
Agriculture
Other - Please Specify



Class 2B (8,500 - 10,000 lbs)
Class 3 (10,001 - 14,000 lbs)
Class 4 (14,001 - 16,000 lbs)
Class 5 (16,001 - 19,500 lbs)
Class 6 (19,501 - 26,000 lbs)
Class 7 (26,001 - 33,000 lbs)
Class 8a & 8b ( Greater than 33,000 lbs)
N/A



Diesel
Gasoline
Natural Gas
Electricity for Charging
Biodiesel
Renewable Diesel
Propane
Hydrogen
Other - Please Specify
N/A





# Data to Analyze – Vehicle Group Operations

- Both daily mileage and annual mileage are requested (as averages for each vehicle group)
- When answering mileage data do not include back-up vehicles nor vehicles that are not in operation so that the mileage responses do not underestimate your daily (non-back-up) vehicle usage
  - When answering daily mileage this question apply the 9 out of 10 rule.
- Ensure daily mileage bins add up to 100%

Ex: Vehicle Group Average Operations for 16 Class 3 Diesel Cargo Vans in Albuquerque

Operate up to 100 average miles per day	Operate up to 150 average miles per day	Operate up to 200 average miles per day	Operate up to 300 average miles per day	Operate more than 300 miles per day	Total (must sum to 100%)
10%	20%	60%	10%	0%	100%



# Data to Analyze – Vehicles

- Multiple *Operations Data* questions should be answered by selecting the nearest 10% for each vehicle group
  - For example, if 6 out of 10 vehicles in the vehicle group have a predictable usage pattern select 60% in this field for the applicable vehicle group

Identify the percentage of vehicles in this group that:									
Has a predictable usage pattern	Fuels primarily on-site	Typically returns to its vehicle home base daily	Has onboard GPS or mileage tracking	Tows a trailer more than 100 miles a day	Commonly operates at its weight limit	Is not registered in New Mexico	Is regularly parked at the facility more than 8 hours each day	Is equipped with all-wheel drive	Are not being operated/are used as backup vehicles
60%	0%	90%	100%	0%	50%	0%	100%	0%	0%

- Do most vehicles in this group stay within 50 miles of their facility on a typical day?
  - This is a Yes or No question
  - The question should be answered based on whether a majority of vehicles in the group operate within a 50- mile radius of the home base location at least 9 out of 10 workdays



# Data to Analyze – Vehicles

- What is the highest approximate percent of the vehicle group that was dispatched at the same time over the last three years on the behalf of a local, state or federal government to support an emergency operation such as repairing or preventing damage to roads, buildings, terrain, and infrastructure as a result of an earthquake, flood, storm, fire, terrorism, or other infrequent acts of nature.
  - Provide the response to the nearest 10% for each vehicle group
- How long after purchase or lease does your organization typically keep the vehicles in this group?
  - Please add response in number format



# Data to Report – Vehicles

- For each vehicle group, identify whether your entity is the fleet owner/operator for this group of vehicles, or if they are dispatched under your brokerage authority.
  - Please select *Owner* or *Broker*, if N/A please explain in comments
- Identify the start and end date of the analysis period selected
  - Please enter the date range
    - Start date should be on or after January 1, 2024
    - Enter an end date that aligns with either annual, quarterly, or another time period from your records, for the data used in your analysis.



# Data to Report - Brokers

- Non-asset-owning brokers:
  - Use office location as home base (unless a local truck yard exists).
  - Report vehicle info from dispatch records
  - Only contract-specific mileage is required.
  - Dispatch records may include load mileage (via waypoints), weight from load info, and vehicle details (where available).
  - Brokers aren't expected to know domicile, fueling, or return trip info.



# Data to Report – VIN List

- Please list the VIN for each vehicle reported and included in your analysis
  - You cannot complete the report with invalid VINs/typos



# Trade Secrets

- If your report contains information considered *trade secret* or *confidential* please note it in the comment sections of the Large Entity Reporting Spreadsheet
  - ▣ Please describe in detail the nature of the data claimed to be a trade secret, confidential information, or otherwise exempt from public inspection under applicable law, including the specific characteristics that make it subject to such protection.



# Finalizing Reporting





# Report Submittal

- Once information is entered to the best of your ability, send the LER Spreadsheet to [cleancarsnm@env.nm.gov](mailto:cleancarsnm@env.nm.gov)
- You will receive a confirmation email when your spreadsheet is received and reviewed for completeness



# Recordkeeping

- ❑ The responsible official shall maintain all records of information used to complete this reporting for 5 years following the report
- ❑ For record keeping purposes, keep notes on what information was used to answer questions and the criteria you used to make any interpretation.
- ❑ Records must include the following
  - For owned on-road vehicles and off-road yard tractors, mileage records and dates from records such as maintenance logs, vehicle logs, or odometer readings, or other records with the information used to determine responses
  - For on-road vehicles and off-road yard tractors not owned but dispatched by the entity, dispatch records and dates, contracts, or other records with the information used to determine the responses
  - Vehicle registration date and jurisdiction for each owned vehicle in the New Mexico fleet
  - Any contracts with contractors, subcontractors, or contracts with subhaulers, or other records with the information used to determine the responses
- ❑ NMED staff may request clarification of reported data.



# Office Hours

Show up to ask NMED questions:

Virtual Office Hours:

☐ 09:00 AM MT-10:00 AM MT

- ☐ May 20, 2025
- ☐ May 27, 2025
- ☐ June 3, 2025
- ☐ June 10, 2025
- ☐ June 17, 2025
- ☐ June 24, 2025
- ☐ July 1, 2025
- ☐ July 8, 2025
- ☐ July 15, 2025
- ☐ July 22, 2025
- ☐ July 29, 2025

Teams Meeting



# Resources

- Kayla Gustafson, *Clean Transportation Specialist*
  - 505-637-1704
  - [CleanCarsNM@env.nm.gov](mailto:CleanCarsNM@env.nm.gov)
  - Climate Change Bureau, New Mexico Environment Department
- Large Entity Reporting LER Spreadsheet
  - <https://service.web.env.nm.gov/urls/VKikbHRh>
- Background Resources
  - More info on LERR: <https://www.env.nm.gov/climate-change-bureau/large-entity-reporting-requirement/>
  - Subscribe to the Large Entity Reporting Topic under Climate Change Bureau to receive updates on this requirement:  
<https://public.govdelivery.com/accounts/NMED/subscriber/new>
  - View the Large Entity Reporting Regulation at 20.2.91.120 NMAC:  
<https://www.srca.nm.gov/parts/title20/20.002.0091.html>



# Thank you!





# Appendix

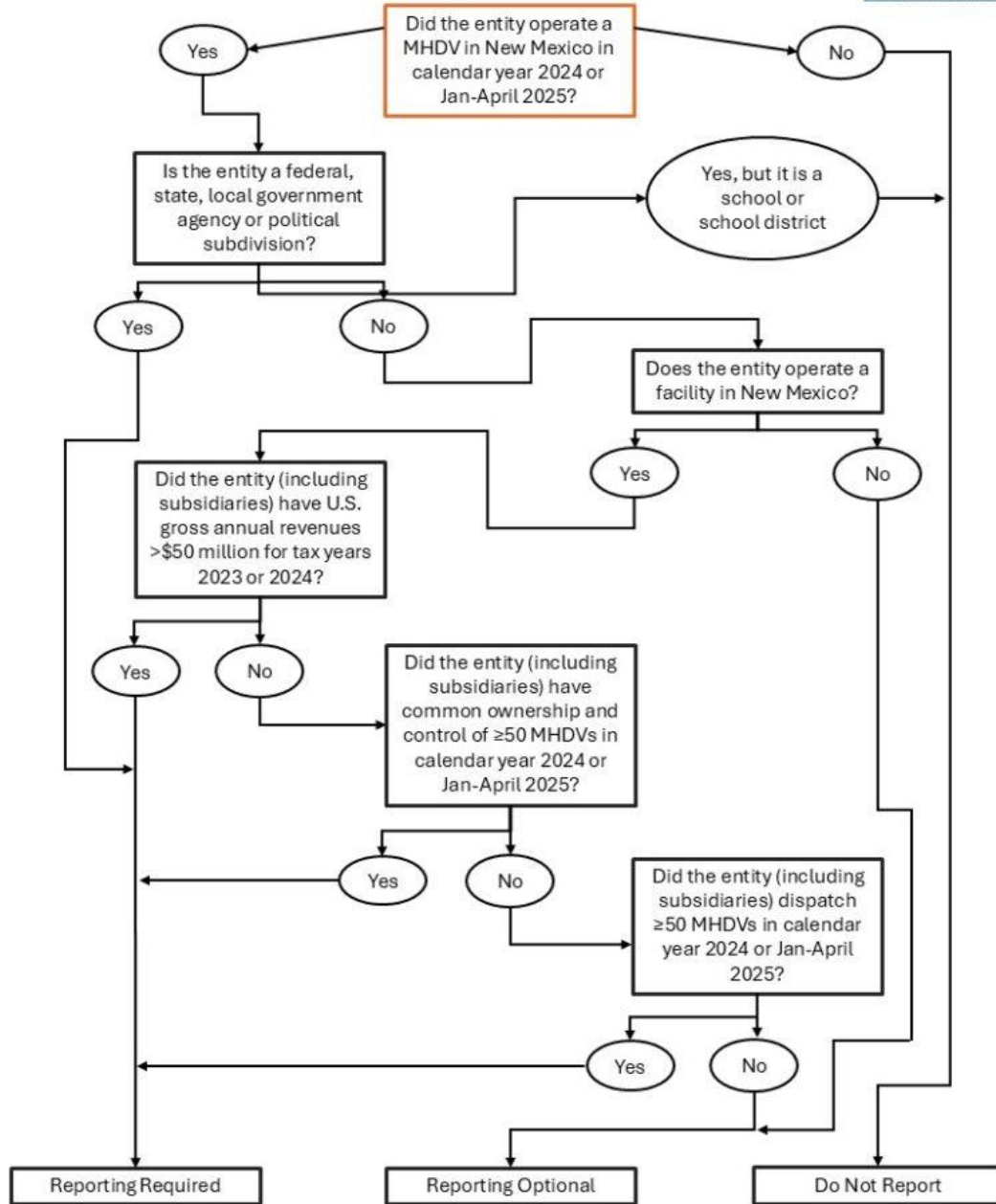




## Large Entity Reporting Requirement

### Who's required to report?

For illustrative purposes only.  
Details located at: [20.2.91.120 NMAC](https://www.nmac.nm.gov/20.2.91.120).





# Data to Report – General

- Affected entities need to report information such as:
  - Organization information
  - Facility (*i.e.*, home base location)
    - Where vehicles are domiciled or dispatched from
    - If vehicles don't have a single home base, or are domiciled at an individual residence, select a location where the vehicles are repaired or maintained
  - Number of Vehicles
  - Vehicle Type
  - Fuel Type
  - Weight Class
  - Miles Traveled
  - *How you operate vehicle types (i.e. vans, tractors) in the State of New Mexico*
  - Vehicle Information Number (VIN)



# Data to Gather – Sources

- Sources to get the required data from the correct internal teams
  - Corporate data
  - Company facilities in NM and infrastructure lists
    - The company real estate group should have this information
  - Fleet management system data from in state domiciled vehicles
- IRP reports
  - To identify interstate vehicles with the majority of their miles in New Mexico
- Company trailer information
- Brokerage Load Records with destinations or origins in New Mexico



# Data to Report – Facility Categories

- **Administrative/Office Building** - building or structure used primarily for day-to-day activities that are related to administrative tasks.
- **Distribution Center/Warehouse** - location used primarily for the storage of goods, which are intended for subsequent shipment.
- **Hotel/Motel/Resort** - commercial establishment offering lodging to travelers and sometimes to permanent residents.
- **Manufacturer/Factory/Plant** - location with equipment for assembling parts, producing finished products, intermediate parts, or energy products.
- **Medical/Hospital/Care** - institution engaged in providing, by or the supervision of physicians, inpatient diagnostic and therapeutic services or rehabilitation services by or under the supervision of physicians.
- **Multi-Building Campus/Base** - property typically operated by a single entity with several buildings, often serving multiple purposes.
- **Restaurant** - business establishment where the primary purpose is serving meals or refreshments may be purchased.
- **Service Center** - facility that supports a business operation that generates revenue by providing a specific service or product, or a group of services or products to a customer.
- **Store** - establishment that sells goods or a variety of goods and services to the public.
- **Truck/Equipment Yard** - establishment that primarily stores or dispatches trucks and equipment such as a garage or parking lot.
- **Any Other Facility Type** - means any facility type that is not listed above.