Large Entity Reporting Requirement
Frequently Asked Questions

Additional Details Located at: 20.2.91.120 NMAC

Who is required to report data as part of New Mexico's Large Entity Reporting Requirement (LERR)?

Under the State of New Mexico's New Motor Vehicle Emissions Standards, certain fleet owners are required by May 1, 2025, to provide information to the New Mexico Environment Department (NMED) regarding characteristics of their commercial medium- and heavy-duty vehicles, such as type and number of vehicles. NMED will exercise discretion for entities that are subject to the May 1, 2025, deadline provided that the entity submits the required report to the NMED Climate Change Bureau by July 31, 2025.

**Note: NMED is no longer using the LERR Portal.*

This one-time reporting requirement only applies to entities that owned, operated, or dispatched one or more medium- or heavy-duty vehicles* in the State of New Mexico in calendar year 2024 or during January 1-April 30, 2025, and who meet one of the following categories:

- Any federal, state, county, or municipal government agency or political subdivision of those agencies, not including schools or school districts. Emergency vehicles and military tactical vehicles are not required to be reported.
- Any entity (including subsidiaries) with U.S. gross annual revenues larger than $50 million for the tax years 2023 or 2024 that operated a facility in the State of New Mexico with common ownership and control of at least one medium- or heavy-duty vehicle.
- Any entity (including subsidiaries) that operated a facility in the State of New Mexico with common ownership and control of at least 50 or more medium- or heavy-duty vehicles.
- Any entity or broker (including subsidiaries) that operated a facility in the State of New Mexico and dispatched 50 or more medium- or heavy-duty vehicles into or throughout the state.

NMED has created a visual flowchart to help organizations evaluate whether they are required to report.

**"Medium- or heavy-duty vehicles" means vehicles with gross vehicle weight ratings greater than 8500 pounds.*

How will NMED collect the data?

To report, fleets should download and complete the Large Entity Reporting spreadsheet and email it to CleanCarsNM@env.nm.gov by July 31, 2025.

**Note: NMED is no longer using the LERR Portal.*

How will NMED use the LERR data collected, and will it be made public?

The data will be used to:

- Inform renewable and low-carbon transportation program development
- Assess where and how zero-emission vehicle (ZEV) adoption is most feasible
- Design future incentive programs for fleet decarbonization
- Inform infrastructure investments and regulatory planning

NMED will not publish raw fleet-level data or business-specific information. The results will be aggregated and anonymized for planning purposes. We are committed to transparency while protecting sensitive business information.

Why does this apply to national companies that only pass through the state?

Many national fleets operate or dispatch trucks in and through New Mexico, contributing to traffic, wear on infrastructure, and emissions. Many national fleets also have local operations in the state of New Mexico. To accurately plan for ZEV charging corridors and future regulations, the state needs to understand not only local fleets but also how national operations intersect with New Mexico's roads. This requirement ensures our data reflects the full picture of local transportation realities.

What does this mean for fleets already struggling with compliance in other states like California?

Unlike California's Truck & Bus or Advanced Clean Fleet mandates, New Mexico's LERR is a one-time reporting requirement. New Mexico's regulations do not include equipment restrictions or ongoing compliance obligations for fleets. New Mexico's reporting requirement is designed to minimize reporting burden and maximize insight, although the questions should be familiar to fleets that operate in other states with reporting programs.

How does this connect to future policies? Should fleets expect ZEV mandates in New Mexico?

LERR is about understanding—not enforcing. The data collected will help NMED make informed decisions about infrastructure gaps, cost barriers, and what types of programs (incentives, grants, etc.) are most needed to ensure the state has a strong economy, while protecting human health and the environment. While no specific mandates are currently tied to this effort, the data will support future planning, including potential alignment with multistate clean truck efforts.

Will this lead to regulation? Is this just the beginning of a broader compliance program?

At this time, no additional compliance obligations are planned. This is not a precursor to enforcement. It's a foundational effort to ensure future programs—whether voluntary or regulatory—are grounded in real-world fleet data, specific to New Mexico's needs.

What happens if a fleet doesn't report by the deadline? Are there penalties?

NMED's focus is on education and voluntary compliance. While the reporting requirement is outlined under 20.2.91.120 NMAC, our top priority is to gather meaningful data to inform future transportation planning—not to penalize fleets. We strongly encourage fleets to report as soon as possible, even if the required deadline has passed.