



AUTO ALLIANCE
DRIVING INNOVATION®

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SUBMITTED ELECTRONICALLY TO <http://www.arb.ca.gov/lispub/comm/bclist.php>

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: ZEV Regulations – 15-Day Notice

Clerk of the Board:

I am writing on behalf of the Alliance of Automobile Manufacturers (Alliance), a trade association representing 12 of the world's leading car and light-truck manufacturers. We are writing to support the concept that fast refueling credits should be proportional to the amount of driving that utilizes fast refueling. However, we believe the reporting requirements proposed in the regulation are unnecessarily burdensome and recommend changes that would reduce this burden while still providing the Air Resources Board (ARB) confidence in the fast refueling credit.

One of the challenges with plug electric vehicles (PEVs) is the time required for refueling. PEVs typically take from three to eight hours to refuel compared to about 10 minutes for a gasoline vehicle. Thus to support innovation in this area, ARB's ZEV regulations have, for many years, provided additional credit for ZEVs that can quickly refuel (in less than 10 minutes).

Fuel cell vehicles (FCVs) always use fast refueling, and we support ARB's recommendation that FCVs always receive the full credit with no data submission required. We also support the concept that PEVs utilizing fast battery swaps should receive fast refueling credit based on the proportion of miles associated with fast refueling. However, as noted above, the reporting requirements seem unnecessarily burdensome. This is very new technology in a tentative market and reasonable efforts should be made to reduce the regulatory burden associated with these vehicles.

Instead of the prescriptive requirements proposed in the regulation, we recommend the Executive Officer approve a demonstration plan based on good engineering judgment that includes statistical samples and documentation on fast refueling. Thus, we recommend modifying the §1962.1(d)(5)(B)(1)(a) and (b) as follows:

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- a. For each specific model year vehicle ZEV type for which a manufacturer claims fast refueling credits, the manufacturer must submit documentation demonstrating the proportion of total fleet miles attributed to fast refueling. The manufacturer shall request Executive Officer approval of the plan to demonstrate total fleet miles attributed to fast refueling based on good engineering judgment including statistically significant fleet samples and documentation of the number of fast refueling events. ~~use in a 12 consecutive month period and total fleet miles in the same 12 month period.~~
- ~~b. To support a manufacturer's claimed number of miles attributed to fast refueling, that manufacturer must provide documentation of each fast refueling event. For each refueling event, the manufacturer must provide documentation of the date of refueling, street address of the refueling facility used, and vehicle identification number of the vehicle refueled. Fast refueling credit applicants shall retain this documentation for a minimum of three years from the date it was created and provide the documentation to ARB staff upon request within 3 business days.~~

We sincerely appreciate your consideration and would be glad to work with ARB further on this issue. Please feel free to contact me at sdouglas@autoalliance.org or (916) 447-7315 if you have any questions or need further information.

Sincerely,



Steven Douglas
Senior Director, Environmental Affairs

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