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# Alliance Comments on Proposed CaRFG Phase 3 Amendments

California Air Resources Board Public Hearing  
Fresno, CA  
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## Alliance Members

BMW Group



PORSCHE

TOYOTA



General Motors

mazda

DAIMLERCHRYSLER



## Recommendation

- **It's time for 10 ppm (ULSG) in California**
  - Lower emissions
  - New fuel efficient technology (lean burn gasoline engines)
  - Since 1999, ARB's goal has been to break even on emissions, instead of reducing them, which increases burden on other sectors
- **California losing leadership position**



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## Sulfur Trends for LA+SF<sup>‡</sup>

	Year	Max	Min	Average*
California refiners, as in Japan and Europe, have sold ULSG for years	1999	60	10	24
	2000	20	10	13
	2001	34	5	14
	2002	22	1	11
	2003	23	2	9.6
	2004	16	4	14
	2005	15	4	9.0
	2006	19	3	9.1

<sup>‡</sup>Alliance of Automobile Manufacturers North American Fuel Survey  
<sup>\*</sup>Rounded to nearest 2 significant figures



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## Alternative

- \* Adopt voluntary ULSG certification and labeling program
- \* Existing program fails to reward refiners for over complying
- \* Market-based incentive will help progressive refiners

## Other Issues

- \* Predictive Model: Proposal reasonable
  - S-NOx curve is not too steep, reflects newer vehicle sensitivity
  - Tech 4 Dual Model: new analysis too late for Alliance position; concern about impact on sulfur
- \* Ethanol, for the record
  - Alliance supports E10—new Predictive Model will allow—and E85, but not mid-level blends for conventional vehicles without demonstration of no harm
  - E10 cert fuel: would change emission standards; raises big/numerous issues requiring significant resources; view with caution

Thank you

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