

Bob Cassidy

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NISSAN

NISSAN NORTH AMERICA, INC.

PO Box 685001

Franklin, TN 37068

October 24, 2013

RE: Board items for October 24, 2013; Advanced Clean Cars MTR report and Updates to the ZEV program.

Dear Chairman Nichols and Members of the Board:

Nissan is pleased to provide these comments on the mid-term review of the Advanced Clean Cars program and on the updates to the zero emissions vehicle (ZEV) program scheduled to come before your Board later in the month.

Advance Clean Cars Mid-Term Review (including ZEV)

The Advance Clean Cars program in California includes regulatory requirements for greenhouse gas emissions, precursor emissions, and the production of zero emission vehicles (ZEVs). It is the primarily regulatory framework over the next decade for addressing climate change effects and for reducing precursor emissions. Nissan remains a willing participant in this program and supports the process defined in the mid-term review (federal and California) that requires a Draft Technical Assessment in November 2017 and a final determination by April 1, 2018. However, it currently remains uncertain whether the ZEV regulations will need to be addressed prior to those dates.

The ZEV market remains in its infancy with continued strong efforts required by government, business, communities, the environmental community and the auto makers. The ARB's development and assistance in creating an MOU and ZEV Action Plan in conjunction with many of the 177 states is extremely important for continuing to expand the ZEV market.

The annual reporting provided by both the mid-term-review and the 177 states' Action Plans will be sufficient to monitor the progress of the ZEV regulations as they approach more challenging sales values in future years. The Staff and Board have a history of careful review of the ZEV program which has served all stakeholders effectively in the past. Nissan welcomes this continued process while now emphasizing the need to robustly improve the market for ZEVs.

ZEV Amendments

The proposed updates to the ZEV regulations are supported by Nissan.

Fast Re-fueling (Battery Swapping)

This provision in the ZEV regulations was intended to recognize the inherent benefit of rapid refueling in developing alternative fuel vehicles that nearly match key attributes of traditional gasoline powered vehicles. Hydrogen powered vehicles were expected to receive fast refueling credits as an incentive for these complex and advanced technology vehicles.

However, should the Board consider allowing ZEV credits for a vehicle with battery swapping capability, Nissan recommends the credits be based on a metric related to actual use of the battery swap feature – not solely on vehicle attributes.

In conclusion, Nissan supports the mid-term review process along with the state Action Planning and annual reporting components. Further, Nissan suggests the proposed ZEV amendments be adopted as written.

Please contact me or Robert Cassidy, Senior Principal Engineer (714-721-7239) with any questions or concerns regarding these issues.

Regards,

Robert A Cassidy for TRACY WOODARD

Tracy Woodard
Director, Government Affairs