



March 17, 2017

California Air Resources Board
1001 I St.
Sacramento, CA 95814

Re: Advanced Clean Cars Midterm Review: Zero-Emission Vehicle Program

The California Electric Transportation Coalition (CalEETC) appreciates the opportunity to provide comments on the California Air Resources Board's (CARB's) Advanced Clean Cars Midterm Review, specifically relating to the Zero-Emission Vehicle (ZEV) Program.

CalEETC is a non-profit association promoting economic growth, clean air, fuel diversity and energy independence, and combating climate change through the use of electric transportation. CalEETC is committed to the successful introduction and large-scale deployment of all forms of electric transportation, including plug-in electric vehicles, transit buses, port electrification, off-road electric vehicles and equipment, and rail. Our board of directors includes: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, and the Southern California Public Power Authority.

Although California is leading the nation in electric-vehicle adoption, our state still has a long way to go to reach the goals in the Governor's Executive Order B-16-2012: 1.5 million zero-emission vehicles on California roads by 2025 and zero-emission vehicle infrastructure able to support 1 million vehicles by 2020. In addition, the state must implement SB 1275 (De León) [Chapter 530, Statutes of 2014] and SB 1204 (Lara) [Chapter 524, Statutes of 2014], which set targets for the deployment of 1 million zero- and near-zero-emission vehicles by 2023, access to these vehicles by disadvantaged and low- and moderate-income communities, and deployment of zero- and near-zero-emission medium- and heavy-duty vehicle technologies.

CalEETC supports staff's recommendation to maintain the current stringency of the ZEV Program for California through the 2025 model year, including the existing regulatory and credit structure. We agree with staff that the ZEV Program is achieving its goal of accelerating development of ZEV technology towards commercialization, as proven through the introduction of more capable and longer-range vehicles. We also agree with staff's recognition of the important complementary non-regulatory programs needed to ensure the success of the ZEV market, such as monetary incentives, HOV-lane access, and those that increase consumer awareness and yield more public-charging infrastructure.

We offer the following suggestions for staff to consider when evaluating the ZEV Program post-2025, or to be considered should staff determine that changes are appropriate pre-2025:

CalETC supports increasing credits for high-performance plug-in hybrid electric vehicles (PHEVs), defined as those vehicles that exceed the 20-mile electric range anticipated by CARB in the most likely compliance scenario. The amount of ZEV credit provided does not accurately reflect the technological advancements or environmental benefits of PHEVs. Data available demonstrates that PHEVs, particularly those with significant zero-emission range, drive about the same number of zero-emission miles per year as battery-electric vehicles (BEVs) with a range of approximately 80 miles.

CalETC does not support any reductions in credit values for BEVs or fuel-cell electric vehicles (FCEVs). Moreover, CalETC does not support an increase in PHEV credit value equal to or in excess of a BEV; we believe there should continue to be a recognition of pure zero-emission vehicles. We would like to work with CARB staff to design a more equitable crediting system for PHEVs (such as amendments to the credit system or shifting certain vehicles to the BEVx or a similar credit category), without any reduction in credit values for BEVs or FCEVs.

CalETC supports increasing credits for larger zero-emission vehicles, such as trucks, vans and sport-utility vehicles (SUVs). Relative to sub-compact and compact vehicles, additional air-quality and climate benefits are realized from replacing larger vehicles with zero or near-zero emission vehicles. CalETC would like to work with CARB staff to design a more equitable crediting system for larger vehicles.

CalETC supports raising the cap on the amount of transitional zero-emission vehicle (TZEV) credits that can be used to comply with the ZEV Program. Raising the cap would increase the number of ZEV sales, maintain a wider variety of technologies in the marketplace, encourage automaker innovation, and allow for a greater proportion of consumers to access zero-emission vehicles. We believe that with such a change to the Program, we could still meet the state's air-quality and climate goals. Currently, the ZEV Program sets a declining cap on the share of TZEV credits, associated with PHEVs, that can be used to comply with the ZEV Program. The ZEV Program is meant to be technology forcing and both BEVs and PHEVs have penetrated the market, both meet specific consumer needs, and both help the state achieve its environmental goals.

CalETC encourages ARB to consider extension of transportation-system credits. The current ZEV Program includes credits to encourage the deployment of ZEVs into shared-use applications such as car sharing and ride sharing. CalETC believes this is an effective way to increase zero-emission miles and educate additional people about ZEV technology. Maintaining these incentives would help to ensure that ZEVs play a prominent role as we move toward connected, shared, autonomous mobility options.

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Thank you for the opportunity to provide comments. Please do not hesitate to let me know if you would like to discuss further.

Regards,

A handwritten signature in blue ink, appearing to read "EWTutt". The signature is written in a cursive, flowing style.

Eileen Wenger Tutt, Executive Director
California Electric Transportation Coalition