

CALIFORNIA AIR RESOURCES BOARD ZEV HD CERTIFICATION

Lisa McGhee

19-6-1

**COMMENTS OF SAN DIEGO AIRPORT PARKING COMPANY (SDAP) ON CARB
PROPOSED REGULATION OF ZERO-EMISSION POWERTRAIN CERTIFICATION
REGULATION**

Lisa McGhee
San Diego Airport Parking Company
2771 Kurtz St.,
San Diego, California 92110
714-881-4856
E-mail: sdapparking@gmail.com

June 27, 2019

SDAP COMMENTS

I. EPA 16 CFR Part 309

Other than Emission Certification procedures EPA has no certification procedure for electric vehicles.

Clean Air Act Amendments (CAAA) deeming that persons who convert to AFV's are manufacturers.

EPA has not yet issued emission standards and certification test procedures for certain fuels (e.g., electricity and hydrogen)

II. Pilot Production is anything under 100 units sold.

April 2018 | CEC-200-2018-005

**Forecast of Medium- and Heavy-Duty Vehicle
Attributes to 2030**

See table below.

Not all combinations of fuel types and weight classes are expected to be introduced into the market. Hence, a matrix of expected combinations was agreed upon by H-D Systems and Energy Commission staff, and the combinations are shown in Table 2-2.

Table 2-2: California Energy Commission Vehicle Class and Fuel Type Matrix

CEC Vehicle Class		Gasoline	Gasoline Electric Hybrid	Diesel	Diesel Electric Hybrid	Diesel Hydraulic Hybrid	Battery Electric Vehicles	Direct (Caterinary) Electric	Fuel Cell Vehicles	E85 (ethanol engine)	Compressed Natural Gas (CNG)*	Liquefied Natural gas (LNG)*	Propane (LPG)
GVWR 3	GVWR 3	O	O	O	P		P			O	A		A
GVWR 4 to 6	GVWR 4	O	O	O	P	A	O			O	A		A
	GVWR 5	O		O		A	O			O	A		
	GVWR 6			O	P	P	O				A		
GVWR 7 & 8	GVWR 7			O	P						A		
	GVWR 8 Single Unit			O							A	A	
GVWR 8	Combination (California)			O				P			A	A	
GVWR 8	Garbage			O	O	A					A	A	
GVWR 8	Combination (Interstate)			O								O	O
Motorhomes	GVWR 3	O		O									
	GVWR 4 to 6	O		O							A		
Bus	Urban Transit			O	O	A	P	O	P		A		
	Motor Coach			O									
	School Bus	O		O			P				A		A
	Shuttle Bus	O				A	O		A		A		

Source: California Energy Commission and H-D Systems

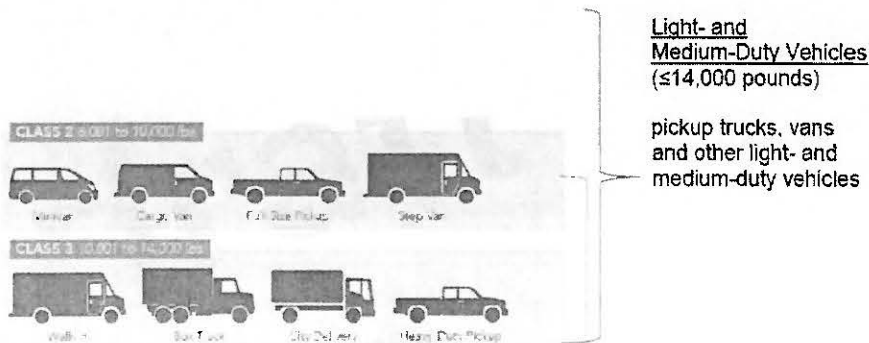
O - Original Equipment Manufacturer P - Pilot Production** A - Aftermarket

* Includes Low NOx engines.

** Pilot production refers to production of less than 100 units per year.

III. CLASS-3 ZEV'S, THE MOST POPULAR HVIP SOLD VEHICLE BY ONE OEM

Figure Z-3: Vehicle Classes



The current HVIP MHD Sales as of 3-23-19 is a total 648 sales since 2009 with 365 sales by **extinct OEM's** (in red text below in tables) that no longer exist and determines that the highest number of OEM sales by an existing and active OEM is 59 by one OEM and this is for the Class 3 vehicles. This continues to address facts that the Class 3 vehicle has a strong potential for accelerated adoption and should be included in the measure. <https://www.californiahvip.org/eligible-technologies/>

<u>Vehicle OEM Sales</u>			
1	BYD Motors	58	8.95%
2	Chanje	22	3.40%
3	EVI	112	17.28%
4	Ford	51	7.87%
5	Lion Bus	6	0.93%
6	Motiv Powers	11	1.70%
7	Navistar	34	5.25%
8	New Flyer	0	0.00%
9	Orange EV	31	4.78%
10	Phoenix MotorCars	43	6.64%
11	Proterra	32	4.94%
12	Smith Electric	168	25.93%
13	Zenith Motors	59	9.10%
14	Workhorse AMP / Thor	1	0.15%
15	Lightning Systems	3	0.46%
16	Eldorado National	5	0.77%
17	Blue Bird	7	1.08%
18	Green Power	5	0.77%
Total EV ZEV Sales		648	100.00%

<u>New OEM's with Sales</u>		
1 BYD	58	8.95%
2 Chanje	22	3.40%
3 Lion Bus	6	0.93%
4 Motive Powers	11	1.70%
5 Orange EV	31	4.78%
6 Phoenix MotorCars	43	6.64%
7 Proterra	32	4.94%
8 Zenith Motors	59	9.10%
9 Workhorse AMP	1	0.15%
10 Lightning Systems	3	0.46%
11 Eldorado National	5	0.77%
12 Bluebird	7	1.08%
13 Green Power	5	0.77%
13 New OEM's	283	43.67%

Dated: June 27, 2019

Lisa McGhee
San Diego Airport Parking Company
2771 Kurtz St., San Diego, CA. 92110
Tel: 714-881-4856, E-mail: sdapparking@gmail.com

