

**Honda's Testimony at the California Air Resources Board's  
Advanced Clean Car Hearing  
October 24<sup>th</sup>, 2013  
Robert Bienenfeld, Assistant Vice President, Product Regulatory Office  
American Honda Motor Co., Inc.**

***Chairman Nichols and Members of the Board:***

Thank you. Honda supports the comments of the Association of Global Automakers.

Honda currently markets the Fit EV and the Accord PHEV in California and other ZEV states, and we are demonstrating the Clarity fuel cell vehicle here in California. We have announced plans to bring a next generation Fuel Cell vehicle to market beginning in 2015.

We are in the process of making our plans and investments now for the steep ramp-up in ZEV volumes for the 2018 and later model years. This is consistent with the ZEV regulation. The last chance for us to adjust these investments will occur in 2015. As you know, the current ZEV regulation established credit categories and values based on research by ARB staff between 2010 and 2011, and approved by this Board at the beginning of 2012, just as EVs and PHEVs were entering the market.

We ask that Staff update what will soon be three- and four-year old assumptions to reflect actual data from the market. For example, the EV Project, in their latest report based on more than 13 million miles driven, filed with the United States Department of Energy<sup>1</sup>, documents that Volt owners drive 20% more electric miles than Leaf owners. In every one

---

<sup>1</sup> The EV Project EVSE and Vehicle Usage Report – 2<sup>nd</sup> Quarter 2013, found at <http://www.theevproject.com/documents.php>

of the 14 EV Project cities<sup>2</sup> around the country, these data are consistent – except in Los Angeles, where Volt drivers nearly 40% more zero emission miles than Leaf drivers.

This would indicate that the TZEV and ZEV categories and credit values established by ARB staff several years ago, without the benefit of actual market data, ought to be reviewed and updated. These small, but important adjustments to ZEV credits can have important implications for automakers looking to maximize the environmental benefits of their technology investments.

Honda believes that all of these vehicle technologies – PHEV, REV, BEV and FCEV – are good and important, and are moving us forward towards our shared goal of radically low-carbon transportation. We have seen this Board labor to make sure that regulatory incentives for the Cap and Trade program, the LCFS and numerous other policy initiatives reflect the best available data. The Zero Emission Vehicle program deserves nothing less.

Thank you

---

<sup>2</sup> The EV Project tracks 16 cities/regions, however only 14 have data for both the Leaf and the Volt.