

April 18, 2014

SUBMITTED AT [HTTP://WWW.ARB.CA.GOV/LISPUB/COMM/BCLIST.PHP](http://www.arb.ca.gov/lispub/comm/bclist.php)

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Notice of Public Availability of Modified Text for the Minor Modifications to the Zero Emission Vehicle Regulation

Clerk of the Board:

The Association of Global Automakers, Inc. (Global Automakers)¹ appreciates the opportunity to comment on the California Air Resources Board's (ARB) *Notice of Public Availability of Modified Text for the Minor Modifications to the Zero Emission Vehicle Regulation*, released April 3, 2014, which proposes changes to the credits for fast refueling.

Global Automakers supports credits to incentivize innovative technologies and/or processes that enhance the customer's use of his/her ZEV. ARB's proposed modification would allow manufacturers to generate fast refueling credits based on demonstrated use of fast refueling infrastructure. As proposed, if all "refuelings" qualify as fast refueling, the applicable vehicles would receive the full fast refueling credit, but if not, the vehicles would receive a portion of the credit based on driving attributed to fast refueling compared to the total miles driven. The fast refueling credits for electric vehicles should be based on actual use. We concur that fast refueling credits for electric vehicles should be based on supporting evidence; we would be interested in further discussion on the way in which this evidence is determined.

In addition, ARB's proposed modification would continue to provide fast refueling credits for fuel cell vehicles but would not impose the proposed reporting requirements. Fuel cell vehicles, by design, will always be fast refueled, and therefore it is not necessary to provide data to substantiate fast refueling. We support this exception to the proposed reporting and data collection requirements for fast refueling for fuel cell vehicles.

¹The Association of Global Automakers, Inc. represents international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Our members' market share of both U.S. sales and production is 40 percent and growing. Our Technical Affairs Committee members include: American Honda Motor Co., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America, Inc., Maserati North America, Inc., McLaren Automotive Ltd., Nissan North America, Inc., Subaru of America, Inc., Suzuki Motor of America, Inc., ADVICS North America, Inc., Delphi Corporation, Denso International America, Inc., and Robert Bosch Corporation. We work with industry leaders, legislators, regulators, and other stakeholders in the United States to create public policy that improves motor vehicle safety, encourages technological innovation and protects our planet. Our goal is to foster an open and competitive automotive marketplace that encourages investment, job growth, and development of vehicles that can enhance Americans' quality of life. For more information, please visit www.globalautomakers.org.

Thank you for considering our comments.

Sincerely,



Julia M. Rege
Senior Manager

Cc: **Richard Corey**
Alberto Ayala
Annette Hebert
Floyd Vergara
Analisa Bevan
Elise Keddie
Anna Wong