

May 5, 2015

SM-3182

James S. Ehlmann, Manager
Vehicle Emissions Policy
Environment, Energy & Safety Policy

General Motors Global Headquarters
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Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Air Resources Board Members and Staff:

General Motors (GM) appreciates the opportunity to comment on the Minor Modifications to the Zero Emission Vehicle Regulation, Notice of Public Availability of Modified Text, with a Public Availability Date of April 20, 2015.

Attachment A of this notice addresses proposed changes to Title 13, California Code of Regulations, Section 1962.2, and Attachment B addresses proposed changes to the associated test procedures. GM has two comments on these attachments.

1. In Section (c)(3)(A)1. on Page A-4 of Attachment A regarding the TZEVE credit allowance for US06 capability, ARB is proposing to change the reference to the applicable test procedure from section G.7.5 to section G.7.3 of the "California Exhaust Emission Standards and Test Procedures for the 2018 and Subsequent Model Zero-Emission Vehicles, and Hybrid Electric Vehicles in the Passenger Car, Light-Duty Truck, and Medium Duty Vehicle Classes," adopted March 22, 2012, last amended May 30, 2014. This change is being proposed because the section numbering of these test procedures is being changed as part of a separate rulemaking which is still open (i.e., not yet finalized). However, when these test procedures become finalized the last amended date will not be May 30, 2014 but instead will presumably be updated to reflect the date of finalization. Therefore, GM requests that the last amended date be updated accordingly. Otherwise reference to section G.7.3 of the May 30, 2014 test procedures will be incorrect because it will improperly reference SC03 Vehicle Preconditioning rather than properly referencing the Optional Cold Start US06 Range Test.
2. On page A-7 of Attachment A, the last portion of the definition for transitional zero emission vehicle (TZEVE) is being changed from "...qualifies for an allowance in subdivision 1962.2(c)(3)(D) or (E)." to "...qualifies for an allowance in subdivision 1962.2(c)(3)(A)." While changing (D) to (A) makes sense because (A) is the section that provides allowance for electric range thereby allowing PHEVs to qualify as TZEVEs, the deletion of (E) does not appear to make sense because it would mean hydrogen internal combustion engine vehicles could no longer qualify as TZEVEs. This presumably is not ARB's intent because it was never discussed in the Staff Report or raised as a substantive issue. Therefore, it appears that the last portion of the TZEVE definition should be changed to "...qualifies for an allowance in subdivision 1962.2(c)(3)(A) or (E)." The comparable change should be made to the associated test procedures, page B-2 of Attachment B, by changing the last portion for the TZEVE definition to "...and qualifies for an allowance in subdivision C.3.3(a) or (e).".



GENERAL MOTORS

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "James S. Ehlmann", written in a cursive style.

James S. Ehlmann
Manager, Vehicle Emissions Policy
General Motors