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VIA ELECTRONIC FILING TO <http://www.arb.ca.gov/lispub/comm/bclist.php>

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

Subject: ZEV Regulations – 2nd 15-Day Notice Comments

Clerk of the Board:

The Alliance of Automobile Manufacturers¹ (Alliance) and the Association of Global Automakers, Inc.² (Global Automakers) offer the following comments on the California Air Resources Board's (ARB) *Second Notice of Availability of Modified Text for the Minor Modifications to the Zero Emission Vehicle Regulation* (Second Notice) regarding proposed changes to the fast refueling credit provisions. Together, our two associations represent nearly every company selling new vehicles in the United States.

We agree it is appropriate for the ARB to provide additional credit for fast refueling. Fast refueling results in more electric miles traveled and makes zero emission vehicles (ZEVs) more competitive with conventional vehicles, both of which are important to meeting the overall goals of the ZEV regulation. We support the board's direction at the October 24, 2013 hearing to "allow battery exchange to qualify under the fast refueling definition only when actual use of battery exchange capability for fast refueling is substantiated." Further, the opportunity to earn fast refueling credit should be technology neutral to include not only fuel cell and battery swap, but also DC fast charging (i.e., Level 3 charging).

That being said, we are concerned about certain elements proposed in the Second Notice. Based on our understanding of the Second Notice, credit could be given to vehicles that are capable of fast refueling but never use fast refueling. Specifically, the Second Notice proposes that each fast refueling event that occurs during the year provides fast refueling credit for one vehicle that is capable of fast refueling, regardless of whether or not the vehicle receiving credit actually uses fast refueling. The only limitation is that any one vehicle can only receive credit

¹ Alliance members include BMW, Chrysler, Ford, General Motors, Jaguar Land Rover, Mazda, Mercedes-Benz, Mitsubishi, Porsche, Toyota, Volkswagen, and Volvo. See www.autoalliance.org for further information.

² Global Automakers' members include Aston Martin, Ferrari, Honda, Hyundai, Isuzu, Kia, Maserati, McLaren, Nissan, Subaru, Suzuki, and Toyota. Please visit www.globalautomakers.org for further information.

for a maximum of 25 fast refueling events. Under this scenario, the use of fast refueling capability on as low as 4% of the vehicles in a potentially capable fleet provides credit for all of the vehicles in that fleet. Looked at another way, a single vehicle could generate up to 125 ZEV credits.

The demonstration of capability should more closely reflect a broader real-world usage in the fleet than ARB proposed in the Second Notice. Allowing multiple vehicle credit generation by a single vehicle does not ensure designs are acceptable to a broad range of customers. This is also not consistent with other ZEV credit mechanisms that operate more on a per vehicle basis, even though those mechanisms might recognize that actual use need not occur on a regular basis for any particular vehicle.

Finally, consistent with the principle of technology neutrality, we request that current DC fast charge (i.e., Level 3 charging) also be considered for fast refueling credit provided that adequate usage can be shown.

Therefore, we respectfully request that ARB develop a modified regulatory proposal that:

1. Provides credit for fast refueling that is more closely aligned with actual and needed usage; and
2. Maintains technology neutrality by including current DC fast charge technology in addition to fuel cell and battery swap fast refueling events.

We appreciate the opportunity to continue working with ARB staff in the development of the regulations.

Sincerely,



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