



California Electric Transportation Coalition

November 5, 2021

RE: Advanced Clean Cars II Draft Staff Proposal

Dear Mr. McCarthy, Mr. Cunningham, and Ms. Wong,

The California Electric Transportation Coalition (CalETC) appreciates this opportunity to support the Advanced Clean Cars II (ACCI) proposed regulations. It is essential to the success of ACCII, once adopted, that California continue to strengthen and increase complementary policies such as the vehicle incentive programs, infrastructure incentives, building codes, and the Low Carbon Fuel Standard.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC supports CARB staff's proposed ACCII regulation ramp up to 100% new vehicle sales of ZEVs by 2035. We look forward to working with CARB to develop and implement this ambitious regulation, and the other complementary policies, e.g. incentive programs, infrastructure, building codes, vital to the ACCII regulation's success.

Complementary policies and programs are essential to the success of California's transition to full electrification of the transportation sector. The ZEV mandate is an essential element of California's and other states' transition to a zero-emission vehicle future. However, California's unprecedented market success is a result of the combination of the ZEV mandate and other policies and programs, most notably the substantial investments California has made in both zero-emission vehicle technologies and supporting infrastructure, the Low Carbon Fuel Standard, and public/private partnerships like the EV Charging Infrastructure Strike Force and Fuel Cell Partnership. As the state moves to strengthen the ZEV program, it will be important to also fortify the other complementary policies that have helped make California a leader in electric vehicle adoption.

CalETC encourages CARB staff to reconsider the proposed durability requirements for battery electric vehicles. Although some minimum durability and warranty requirements are beneficial, the staff's proposed durability requirements exceed international performance requirements, do not anticipate the grid integration potential for electric vehicles, and will increase the cost of electric vehicles. CARB staff's durability proposal could inadvertently harm other metrics of performance for EVs, i.e. auto

makers may need to restrict vehicle-to-grid capabilities and/or charging ability, that are attractive to consumers. Given the technology advancements and pace of these advancements required by the proposed ACCII mandate, it is appropriate to set initial performance standards that align with international protocols. If more stringency in durability standards is determined necessary as the market accelerates, those can be considered and evaluated more fully.

CalETC supports CARB's inclusion of plug-in hybrid electric vehicle (PHEV) technologies in the ACCII regulations. We believe PHEVs provide more than a bridge technology option over the next decade. As the state endeavors to catch up and build out adequate charging infrastructure and establish building codes and programs that allow all Californians to access affordable home charging solutions (e.g. chargers in parking areas of multi-unit dwellings, streetside chargers for renters or homes without access to off-street parking, or nearby affordable DCFC options) and hydrogen refueling stations, it will be crucial to ensure that hybrid options are available. Plug-in hybrid options may be the only viable and/or equitable electric solution for some single vehicle households, households with limited access to electricity fueling infrastructure, and/or drivers that use their vehicles for heavy work such as hauling or towing. The staff's proposal to increase the all-electric range for ACCII qualifying PHEVs is appropriate, however before finalizing the requirement CalETC encourages CARB to monitor technology development, equity considerations and, consumer experience as the current PHEV proposal will require substantial increases in all-electric range in a short timeframe.

Charging infrastructure that is accessible and affordable for all Californians is key to a full and equitable transition to zero-emission vehicle technologies. California has led the nation in implementing incentive programs and utility investment in EV charging infrastructure. Even with the impressive efforts to build out supporting charging infrastructure, California has lagged in its infrastructure efforts. There is currently insufficient charging infrastructure in place to support those EVs on the road today and the state lags in building out sufficient infrastructure to support full transportation electrification. Public funding, building codes that support charging infrastructure, expedited permitting and interconnection timelines, and consumer and stakeholder support will need to accelerate quickly to support the requirements of the ZEV program and California's ambitious goals.

Thank you for your consideration and CalETC looks forward to working with the CARB staff and Board on this important regulation.

Regards,

A handwritten signature in blue ink, appearing to read "Eileen Wenger Tutt".

Eileen Wenger Tutt, Executive Director  
California Electric Transportation Coalition