

## Jensen, Tracy@ARB

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**From:** Williams, Mark@ARB  
**Sent:** Tuesday, August 25, 2015 4:41 PM  
**To:** Jensen, Tracy@ARB  
**Cc:** Keddie, Elise@ARB; Whitney, Daniel@ARB  
**Subject:** Comment received during ZEV IVM second 15-day period

Hi Tracy,

Below is an email we received during the second 15-day comment period for the ZEV IVM rulemaking. It pointed out an error in language in the test procedures associated with the ZEV regulatory language. At the time, the submitter did not want to formally submit his comment to the docket, but now that we've released a third 15-day notice to correct the error, we wish to add it to the comment log. I apologize for not getting it to you sooner.

Regards,  
Mark

Cc: Elise, Daniel

**Mark Williams**  
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Visit [www.SaveOurH2O.org](http://www.SaveOurH2O.org) for water conservation tips.

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**From:** James S. Ehlmann [<mailto:james.ehlmann@gm.com>]  
**Sent:** Wednesday, June 10, 2015 1:01 PM  
**To:** Williams, Mark@ARB; Keddie, Elise@ARB  
**Subject:** ZEV 15-Day Notice Package

Mark, Elise:

I just did a quick review of the 15-day notice package. Shouldn't the test procedures say (a) **or** (e) instead of (a) **and** (e) since a TZEV can qualify based on either all electric range (i.e., a PHEV) or as a hydrogen internal combustion engine vehicle? To me "and" means it would need to meet both. I think "or" as used in the 1962.2 language is correct.

From 1962.2

(16) "Transitional zero emission vehicle" or "TZEV" means a vehicle that meets all the ~~all~~ criteria of subdivision 1962.2(c)(2) and qualifies for an allowance in subdivision 1962.2(c)(3)(A) ~~or (E)~~ **or (E)**.

From Test Procedures

**"Transitional Zero Emission Vehicle" or "TZEV"** means a ~~PZE~~ vehicle that meets all the criteria of subdivision C.3.2 and qualifies for ~~has an~~ allowance in subdivision C.3.3(a) **and (e)** ~~of 1.0 or greater, and makes use of a ZEV fuel.~~

Let me know what you think. Thanks.

Jim

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