

Advanced Clean Cars II Testimony - Mazda 6/9/22

Good afternoon Chair Randolph and members of the Board. My name is Kevin Curley and I am the manager of Vehicle Emissions Certification and Compliance for Mazda North American Operations. As a member of the Alliance for Automotive Innovation, we support their comments today. Mazda is a smaller independent automaker not owned by a larger brand, and sells light duty vehicles globally with US operations headquartered in Irvine, CA. Despite being a smaller company, Mazda was able to achieve the highest fleet average fuel economy of all OEMs for five years in a row.

The proposed ZEV sales percentage standards in the Advanced Clean Cars II regulations are incredibly challenging and will require tremendous resources from OEMs in order to transition to electrification. This transition is even more difficult for smaller companies like Mazda.

In addition to the already challenging annual ZEV percentage standards, extra requirements such as minimum range, battery durability, limits on credit flexibility, in-use testing and reporting, will add unnecessary cost and potentially decrease affordability of ZEVs. The uncertainty of the supply chain for critical minerals for batteries could also increase these costs further.

Separately, the proposed changes to ICE criteria emissions requirements could reduce the already limited R&D resources from electrification, and considering that new passenger vehicles today are already 98-99% cleaner than when emissions programs started, it may have little impact in reducing smog in the state. While some of the new test procedures may only require calibration changes to comply, we are concerned that others may potentially require additional hardware to achieve.

Finally, California has made progress on supportive measures for ZEVs such as charging infrastructure, building codes, and purchase incentives, but more is needed and other States are lagging far behind. Without these complementary measures to accelerate customer demand in the Section 177 States it will be very difficult to increase ZEV percentages from their current low levels.

Thank you for your time.