



Mercedes-Benz

Mercedes-Benz
Research & Development
North America, Inc.

STATEMENT
BEFORE THE: California Air Resources Board
Advanced Clean Cars II
June 25, 2022
Amy Lilly, State Regulatory Principal Specialist

Good Morning/Afternoon,

My name is Amy Lilly with Mercedes-Benz Research & Development North America. Mercedes-Benz thanks CARB staff for the revisions in the 15-day change notice.

We understand the need for challenging standards and we have aggressive plans to sell EVs – in fact, the goal is for 100% of our fleet to be electric by 2030. Just the same, we can foresee some roadblocks that could hinder us from achieving our goals. Therefore, we think it is extremely important for a stakeholder process to move forward that ensures that everything from regulatory requirements to market development is going in the right direction, and if not, to make adjustments if necessary.

While we understand the process is expedited for finalizing this rulemaking, at a minimum, we would appreciate the board's support in addressing the following three issues as part of a technical amendment in the near future.

First, we reiterate our request for flexibility under the data standardization requirements. In our previous comments, and as recognized by the board at the June meeting, this requirement may unnecessarily limit the ability for ZEVs to be sold in the state. We suggest the addition of an option to certify vehicles without earning ZEV credits when they have met all assurance measures other than data standardization. This option would provide an important transition for vehicles launching in the near future that won't be updated prior to implementation of the data standardization requirements.

Second, Mercedes-Benz would like to thank CARB for allowing MDVs to earn credits in ACC II. However, we believe that MD-ZEVs should be allowed to meet a lower, MDV-specific minimum range. CARB's own data gathered from the Advanced Clean Truck Large Entity Report reveals that the vast majority of cargo vans, like our Mercedes-Benz Sprinter van, travel less than 100 miles per day for last-mile package delivery or vocational use.

Mercedes-Benz
Research & Development
North America, Inc.,
309 N. Pastoria Ave.
Sunnyvale, CA 94085
Phone 1 408 991 6200
www.mbrdna.com



Mercedes-Benz – are registered trademarks of Mercedes-Benz AG, Stuttgart, Germany



Mercedes-Benz

Mercedes-Benz
Research & Development
North America, Inc.

Lastly, Mercedes-Benz would appreciate the opportunity to continue to work with CARB staff on the MDV PEMS provisions and seek additional amendments in the future, to ensure CARB's regulations properly account for use-cases and vehicle capabilities.

Thank you again for your leadership and the staff's hard work throughout this process.