



October 22, 2024

SUBMITTED ELECTRONICALLY AT: <https://ww2.arb.ca.gov/lispub/comm/bclist.php>

Re: Notice of Public Availability of Modified Text and Availability of Additional Documents for the Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure

To Chair Randolph, Honorable Members of the California Air Resources Board ("CARB"), and Staff,

Rivian Automotive, LLC, ("Rivian") appreciates the opportunity to submit 15-day comments in response to the modifications released on October 7 as part of the Advanced Clean Truck ("ACT") regulation. **Rivian remains strongly supportive of the ACT and the current rulemaking to update the regulation.**

Secondary Manufacturers

Rivian supports the proposal to allow secondary manufacturers the ability to trade, sell, or otherwise transfer ZEV credits. With this change, secondary manufacturers can choose to trade ZEV credits thereby ensuring supply of vehicles for upfit as industry ramps ZEV production.

Rivian asks that CARB consider the higher marginal administrative costs of smaller credit sales volumes. Rivian has been in discussions with secondary manufacturers interested in purchasing ZEV credits for the purposes of offsetting the ZEV obligation of their vehicle suppliers. However, Rivian is concerned that the proportionally higher administrative cost of small contract volumes may put secondary manufacturer credit sales at a disadvantage to OEMs seeking to purchase larger volumes of credits. To address this concern, a simple credit multiplier could be used to help offset the higher marginal costs. This multiplier would put secondary manufacturers on a level playing field with their suppliers (OEMs). This multiplier could be restricted to only low volume credit sales and limited to secondary manufacturers who buy credits from a manufacturer other than their supplier or perhaps limited to purchases from ZEV-only manufacturer to avoid self-dealing. The multiplier could also be phased out over time. To account for the higher marginal cost of low volume ZEV credit trades, we estimate a credit multiplier of 1.4 would be needed. Rivian asks that CARB apply a limited multiplier of 1.4 to credits traded to secondary manufacturers from EV-only manufacturers.



Certification to Receive ZEV Credit for Complete Medium-Duty Vehicles

Rivian supports the proposed changes in section 1963.2(i) titled "Certification to Receive ZEV Credit for Complete Medium-Duty Vehicles". These changes will allow manufacturers of Medium-Duty Vehicles ("MDVs") to realize the credit optionality as expressed and adopted in January 2021 beyond model year 2025. Rivian agrees that these changes are necessary to ensure the continued certification pathways for complete medium-duty ZEVs to generate credit under the ACT regulation.

We look forward to strongly supporting the proposed amendments at the November hearing.

Sincerely,

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