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Clerk of the Board, California Air Resources Board
1001 I Street
Sacramento, CA 95814
via <https://www.arb.ca.gov/lispub/comm/bclist.php>

Subject: Ford Comments on the Proposed Amendments to the Advanced Clean Trucks (ACT) Regulation and the Zero-Emission Powertrain Certification Test Procedure

Dear Chair Randolph and Members of the Board,

Ford Motor Company (Ford) hereby submits these comments on the California Air Resources Board's Notice of Proposed Amendments to the Advanced Clean Trucks (ACT) Regulation and the Zero-Emission Powertrain (ZEP) Certification Test Procedure. We appreciate the opportunity to comment as well as CARB's time and consideration.

Ford supports California's efforts to accelerate the widespread adoption of zero-emission (ZEV) vehicles. Particularly, we are very interested in the progress of the ACT regulation, as we sell more electric vehicles (EV) with gross vehicle weight over 8,500lb than any other manufacturer. As a company, we are committed to offering our customers a range of vehicle options to meet their needs – from fuel-efficient gas to hybrid and electric vehicles – that make a real difference in reducing carbon emissions over time.

Ford supports the comments submitted by the Alliance for Automotive Innovation (Auto Innovators) and requests that CARB address these industry comments in the final rulemaking. Additionally, we would like to emphasize the critical need to address our previous comments regarding the greenhouse gas (GHG) implications of ZEP Certification and fleets by including further details on our concerns with this comment letter.

In a September 24, 2024, letter to CARB regarding medium-duty ZEV certification pathways, the Auto Innovators requested a clear statement from CARB that ZEV credit certification pathway would not determine the GHG averaging set for medium-duty ZEVs. Given the past uncertainty in this area and with the new proposed language, Ford supports the comments submitted by the Auto Innovators

requesting that CARB more explicitly state in 13 CCR 1963 that ZEV credit certification pathway, including ZEP certification, does not impact the GHG averaging set for medium-duty vehicles.

We suggest a potential addition to the language under Section 1963.2, to add a subsection (k), as follows. This could be placed elsewhere in the regulation, as CARB deems most appropriate:

- (k) *GHG Averaging.* A medium-duty ZEV may be part of either a heavy-duty vocational vehicle or a medium-duty vehicle greenhouse gas averaging set at 17 CCR 95663(a) or (b) based on the applicability of those sections and independent of the certification pathway followed to receive ZEV credits.

Incorporating higher volumes of ZEVs, as a percentage of an automaker's total product offerings, is a step-wise process whereby penetration rates will vary by segment based on consumer demand and the successive introduction of new products. To encourage automakers to introduce as many ZEVs as possible, CARB should provide them with as much flexibility as possible to include those ZEVs in different averaging sets to show compliance. We see no reason in CARB's laws and regulations that this must be determined by how the automaker certifies the ZEV or generates ZEV credits.

If you have any questions, please contact Steve Henderson, Vehicle Regulatory Strategy & Planning (shenders@ford.com), or Evan Belser, Policy Strategist and Managing Counsel (ebelser1@ford.com). Thank you for your attention to these comments.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia Williams". The script is cursive and fluid, with the first name "Cynthia" and last name "Williams" clearly legible.

Cynthia Williams