

TO: California Air Resources Board

SUBJECT: Comments on proposed regulation of PHEV conversions (Agenda Item # 09-1-8)

After having read (on CARB's website) 75 public comments on the proposed regulation, I am humbled by the wisdom of the crowd. In all of those comments I read one that seemed neutral (from American Honda Motor Company). The rest were clearly and strongly against immediate adoption of the proposed requirements on PHEV retrofit manufacturers. These commenters are obviously folks who normally side with CARB on regulations that make the air healthier. Yet they all make a possible exception in this case. Why? The commenters have apparently determined the following items are true.

- These regulations cannot significantly impact air quality in the short term (because they would affect too few vehicles over the next several years) and they can be phased-in as the fleet of PHEVs grows (instead of being enacted all at once at an unnecessarily early stage in the game).
- Even if the PHEV retrofits were to emit more than the original vehicles, their impact would be mitigated by their amazingly lower fuel consumption and by the valuable information gained through actual, real-world use of this new technology.
- An important part of the bigger picture is that diversifying our transportation energy sources away from foreign petroleum and toward grid-supplied electricity serves a larger, more important purpose that is in perfect alignment with federal and other state priorities (e.g., AB32).
- One important way to rebuild our economy is through innovation and improved efficiency -- the very essence of the young PHEV conversion industry that should be encouraged and nurtured in California.
- Stifling innovation in this area will discourage innovation in other areas where this approach to fuel efficiency and diversification might yet be applied.
- PHEV retrofits are a way to more quickly impact our dependence upon foreign petroleum over the next 10-years while we wait for the larger, less agile companies (i.e., the vehicle OEMs) to bring purpose-built PHEVs and EVs into the market, changing the fleet through normal attrition.
- Time is not of the essence in this case and there is ample opportunity to work with those involved in the PHEV retrofit industry to better craft the proposed regulation so that it addresses the practicalities of our common energy and pollution goals, while maintaining air quality.

Based upon my experiences over the past 15 years of having worked with CARB, BAR, and various AQMD staff on mobile source air quality issues, I have a few other bullets I would like to add to this list.

TO: CARB

About Agenda Item # 09-1-8

- CARB should take advantage of this perfect opportunity to gather real duty-cycle and emissions data on real PHEVs in actual use to better inform a future, more appropriate regulation. The early adopters who willingly pay \$7,000 to \$11,000 extra just to drive a PHEV will undoubtedly be willing to participate in innovative data collection programs (such as continuous I/M that would monitor and report OBD trouble codes in real-time using cellular technology). This would allow us to determine whether a problem exists at all, instead of squashing a new, promising and important industry because a problem might exist.
- CARB and the California Energy Commission should use AB118 funds to promote the intelligent and rapid implementation of these retrofits and to port these technologies to heavier vehicle platforms where each retrofit will have a larger and longer-lasting impact than in the light-duty market.

I implore the Board to hear and act upon the wisdom of this crowd and the legions of others who are saying, "slow down a little, and work with us to craft a better regulation." Our state will be better served by an approach that takes into account other important and pressing priorities, such as diversification of our transportation energy sources and an improved state economy, in addition those important priorities already addressed in the proposed regulation.