

Overregulation of Supplemental Plug-in Hybrid Conversions

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Partnerships' Focus is on Converting Pickup Trucks & SUVs to Plug-in Hybrids

- Biggest impact on gallons per mile
 - 85 million vehicles
 - Poor fuel mileage and emissions
 - 25 % fuel saving
 - 140 million tons of CO₂ per year
- Third generation technology
- Patents
- Competitive wins

Supplemental Plug-in Hybrid Conversions

- Original IC engine, emissions control, evaporation control maintained
- Electric drive added to drive shaft
- Electric energy supplements gasoline
- IC engine is running all the time
- Operation is transparent to the driver

Additional Regulations are Unwarranted

- Emissions will be regulated by state inspection requirements
- Evaporation will be controlled by the IC engine
- Special warranties are not required
 - Hybrid failure leaves the vehicle as before
- OBD monitoring is not required
 - Hybrid system failure does not increase emissions over the original vehicle

Regulation will Stifle a New Industry

- Additional testing is expensive
 - Emissions testing is bearable
 - Evaporation testing is excessive
- Warranty requirements are a show stopper
 - There is no track record
 - The proposal is for an unlimited liability
 - It is unfinanceable
- OBDII modification is completely unaffordable
- CARB regulations are copied by 10 states

Regulatory Action is Premature

- There is no industry at present
- The number of converted vehicles will be minimal for several years
- The probability is that conversion will reduce emissions
- The technology is evolving very rapidly
- A period of observation will not result in material harm to the environment
- Destruction of a nascent green industry will definitely harm United States competitiveness