

Robert Babik
12-1-2

**Testimony of Robert Babik, Director
Environment, Energy and Safety Policy, General Motors
on Item 12-1-2: Advanced Clean Cars
California Air Resources Board Public Hearing
January 26-27, 2012**

Chairman Nichols and Members of the Board, I am Robert Babik, Director of Environment, Energy and Safety Policy at General Motors. I appreciate the opportunity to offer the following comments today.

The new GM promised to focus on the vehicles that Americans want to buy. That approach is working, and has enabled us to continue to invest in advanced technologies. The successful debut of the Chevrolet Volt represents what is possible in vehicle electrification. We recently announced another extended range EV, the Cadillac ELR, and an all-electric version of the Chevrolet Spark mini-car. We also continue to make large investments and impressive advances in hydrogen fuel cells, with a system half the size of the prior-generation.

All of these advanced technology vehicles meet CARB's goals, but we would like to see some of them fit better with CARB's regulations.

For example, the ZEV regulations ideally encourage vehicles that maximize electric miles traveled. While pure BEVs are limited to trips within their EV range, extended range EVs like the Volt can be driven on all trips, and can be a household's only car. Extended range EVs like the Volt will be driven most of the time on grid electricity. We know this based on real world data—we don't need to guess. Therefore, we ask that the BEVx criteria be modified by changing the minimum electric range requirement to 50 miles to align it with the ZEV category, and by allowing unlimited range on the APU. The BEVx category will then promote vehicles that achieve more electric miles, have the same amount of EV technology, and have broader market acceptance than similar range 50-mile BEV.

In contrast, while this modified BEVx proposal will strengthen the ZEV program, the GHG-over compliance provision runs directly counter to it, and counter to CARB's goal of ensuring volumes needed to commercialize ZEV technology. We don't see how this provision makes the ZEV program better.

Now I would like to offer our support on several items, including CARB's efforts to address hydrogen infrastructure through policies such as its Clean Fuels Outlet rulemaking. It is critical to provide certainty that hydrogen stations will be there when fuel cell vehicles arrive in the marketplace. To put it simply, we can't bring to market what consumers can't refuel.

We appreciate CARB working with the EPA to harmonize its greenhouse gas standards as part of one national program. We have worked closely with CARB on LEV III and ask that CARB continue to work with EPA to harmonize criteria emission standards with EPA's upcoming Tier 3 rule. Being able to develop one set of clean cars to one set of national requirements makes sense for all of us.

We also appreciate CARB and the 177 States working with us to develop a ZEV compliance option for these States.

Thank you and I would be glad to answer any questions.