

AMERICAN AUTOMAKERS AAPC



May 13, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814
Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure
(Submitted via <https://www.arb.ca.gov/lispub/comm/bclist.php>)

Comments of American Automotive Policy Council (“AAPC”) on CARB’s Notice of Public Hearing to Consider Proposed Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure

The American Automotive Policy Council (AAPC) on behalf of its member companies – Ford Motor Company, General Motors Company, and Stellantis - appreciates the opportunity to offer comments on the California Air Resources Board’s (CARB) proposed amendments to the Advanced Clean Trucks Regulation, including “Amendments to the Advanced Clean Trucks Regulation and the Zero-Emission Powertrain Certification Test Procedure”.

If you have any questions, please contact me at 202-789-0030.

Sincerely,

A handwritten signature in black ink that reads "Matt Blunt".

Matt Blunt
President

The American Automotive Policy Council (“AAPC”), headquartered in Washington, DC, is a trade association helping American Automakers deliver on their unwavering commitment to vehicle safety, quality, cutting-edge research and development, and unmatched investment in our country’s automotive workforce, by representing Ford Motor Company, General Motors Company and Stellantis on their common public policy interests.¹

AAPC member companies support California’s authority to set state standards that will be at least as protective of public health and welfare as applicable Federal standards, as outlined in section 209(b) of the Clean Air Act.² AAPC appreciates the ability to engage with CARB as California develops, proposes, finalizes, and ultimately seeks a waiver of Federal preemption to implement its regulations.

On July 6, 2023, Ford, GM, Stellantis and CARB affirmed continued commitment to achieving significant reductions of air pollutants in California as signatories to the Clean Truck Partnership Agreement (Agreement).³ CARB’s public hearing to consider proposed amendments to the Advanced Clean Trucks Regulation, and its publication of proposed amendments,⁴ are important steps toward CARB fulfilling its commitments in that co-signed Agreement. AAPC is hopeful that CARB will propose and finalize administrative processes for Advanced Clean Trucks initial reporting and certification, and ultimate compliance that are practicable to administer and consistent with CARB issued guidance on initial ACT credit reporting,^{5,6} and are not inconsistent with Federal regulations.

As part of the Advanced Clean Trucks amendments or through a Memorandum of Understanding (MOU), AAPC urges CARB to clarify and confirm acceptable manufacturer test procedures and documentation for determining “all-electric range” used in the “NZEV Credit Calculation”.⁷ As part of the Advanced Clean Trucks Regulation, manufacturers may earn credits for a “Near-zero-emission vehicle” or “NZEV”, which includes plug-in hybrid vehicles. As outlined in Section 1963.2 (b)(1) and 1963.2 (b)(2) “NZEV credits” are earned based on “all-electric range”. The Advanced Clean Trucks regulation includes vehicles subject to a wide range of certification procedures and test cycles, including chassis dynamometer certified Class 2b-3 vehicles, and powertrain dynamometer and GEM

¹ <https://www.americanautomakers.org/about-aapc>

² 42 U.S.C. § 7543.

³ Clean Trucks Partnership Agreement: [CARB and the Truck and Engine Manufacturers Association Agreement](#)

⁴ Proposed Amendments to the Advanced Clean Trucks Regulation, March 26, 2024:

<https://ww2.arb.ca.gov/rulemaking/2024/advancedcleantrucks>

⁵ https://ww2.arb.ca.gov/sites/default/files/2023-03/ACT-MAC_2023-01.pdf

⁶ Clean Trucks Partnership Agreement, Appendix C, section B. “In a show of good faith, in calendar year 2023, CARB issued guidance on ACT credit reporting, clarifying that **compliance determination** and **sales reporting requirements** are **both defined when vehicles are produced and delivered for sale in California**. CARB staff will also propose to initiate a rulemaking action to that effect in calendar year 2024.”

⁷ Section 1963.2 (b)

certified vehicles.⁸ Different test procedures and operating assumptions result in different estimates of all-electric range, even for the same vehicle. 17 CCR section 95663(d), and subsequently “California Greenhouse Gas Exhaust Emission Standards and Test Procedures for 2014 and Subsequent Model Heavy-Duty Vehicles”,⁹ do not make clear how to determine “all-electric range” of GEM certified vehicles. AAPC looks forward to continuing to work with CARB to confirm acceptable methods manufacturers may use to determine “all-electric range” and to earn NZEV credits for NZEVs delivered for sale in California.

⁸ [Greenhouse Gas Emissions Model \(GEM\) for Medium- and Heavy-Duty Vehicle Compliance | US EPA](#)

⁹ https://ww2.arb.ca.gov/sites/default/files/2022-09/Phase%20%202019%20version_0.pdf