California's Advanced Clean Cars Midterm Review

March 24, 2017



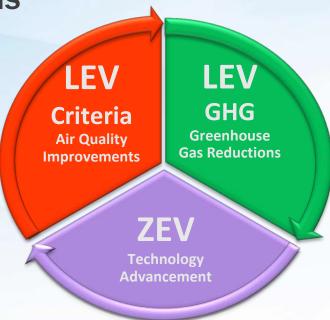
Advanced Clean Cars

Approved as an integrated regulatory package in 2012

LEV III Criteria and GHG Standards

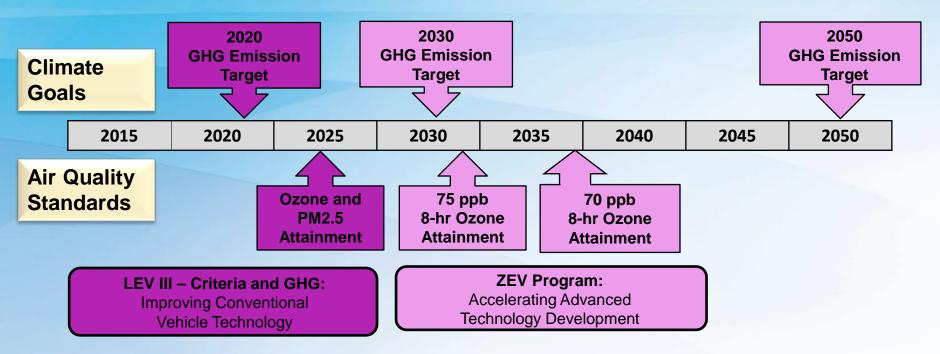
- 75% reduction in fleet average NMOG + NOx emissions
- 90% reduction in PM emission standard
- ✓ 34% reduction in GHG emissions
- > ZEV

✓ More ZEVs and PHEVs





Meeting long term emissions targets



Advanced Clean Cars Midterm Review and the Federal Process

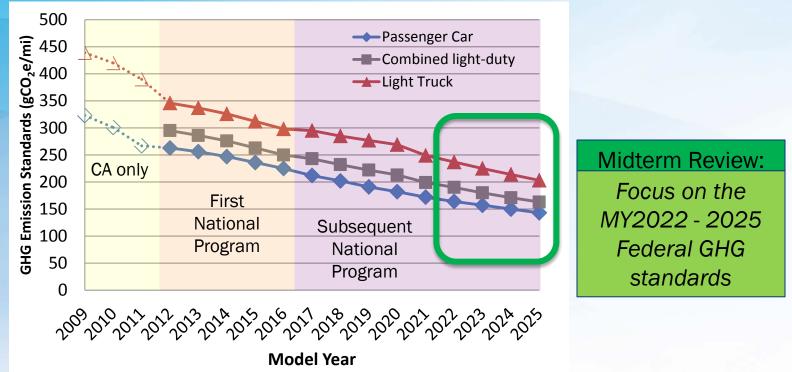


Inter-agency Coordination on Midterm Evaluation of One National Program



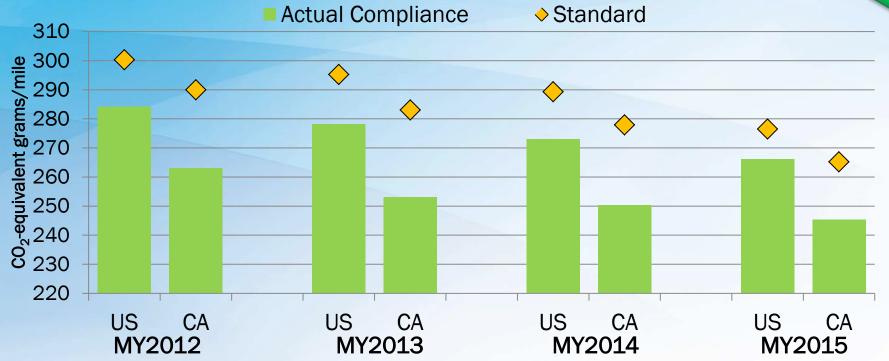


Light-duty GHG Standards





Manufacturers are over-complying with current GHG standards





Standards calculated based on sales from the six large volume manufacturers subject to CA GHG regulations for MY 2012-2015 including credits.

LEV

GHG

Technology has evolved rapidly to meet the standards

- Advanced engines and transmissions
- Vehicle light-weighting
- Improved aerodynamics
- Low rolling resistance tires
- Stop-start and advanced stop-start (e.g., 48 Volt) technology







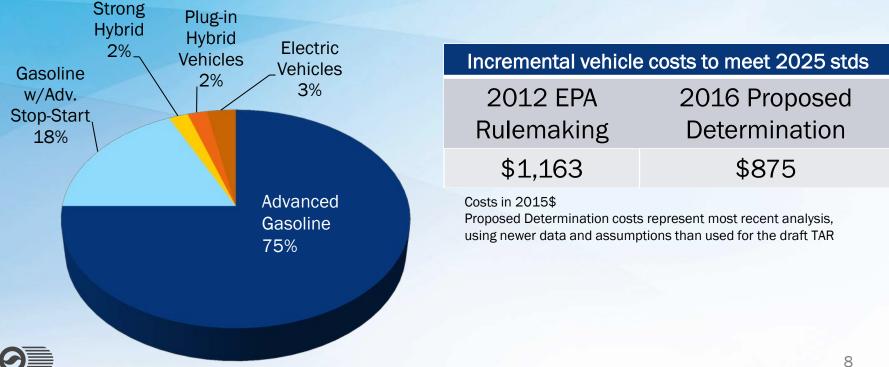


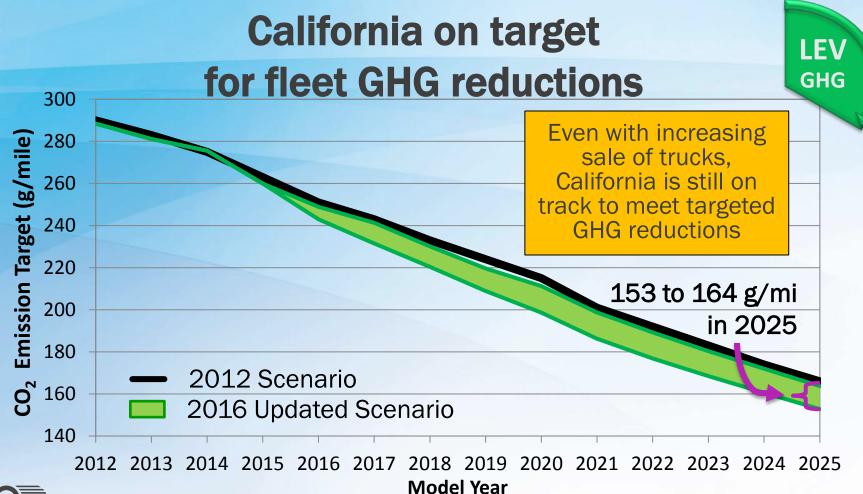


LEV

GHG

Future standards can be met with LEV GHG conventional technology at reduced cost





Issues Raised by Industry



Industry: Analysis overestimates efficiency/underestimates needed technology

- More technology required, including stronger electrification, which means higher costs
- Consumer acceptance/demand, especially of stronger electrification, is inadequate

CARB Response: Data well grounded in actual testing and analysis concluded higher levels of technology are not needed

- Alternative technology evaluations confirmed strong electrification not needed
- Electrified sales in CA already near levels projected for 2025



Staff Recommendation





Are the model year 2022 - 2025 Federal GHG standards appropriate?

Recommendation: Yes, analysis affirmed current federal standards are appropriate, and CARB recommends continued participation in the National Program through 2025, provided no future changes weaken expected benefits in California.

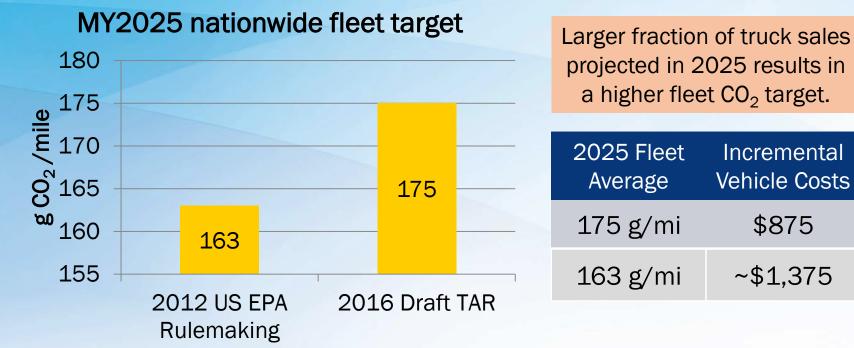


Continue monitoring other activities

- Reconsideration of federal re-opening of Final Determination
- Canada's midterm review
- Global activities



Analysis of National Fleet

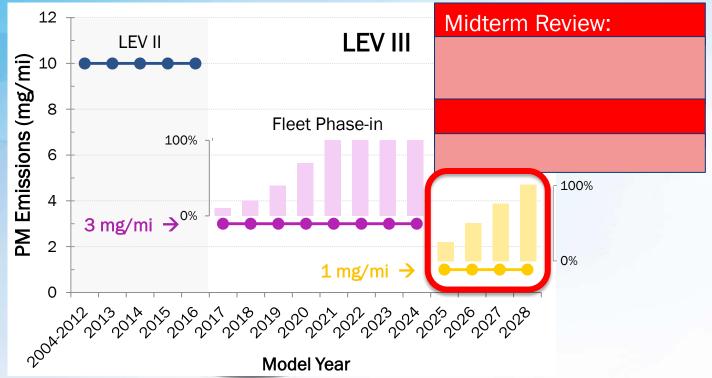




LEV

GHG

1 mg/mi Particulate Matter (PM) Standard





PM Measurement Evaluation Staff Recommendation



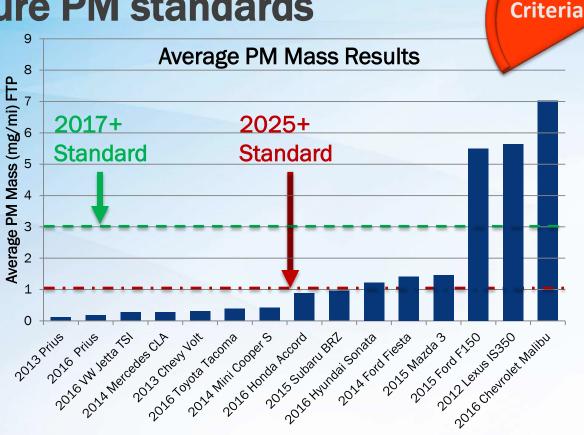
Review Question: Can we accurately measure PM emissions at 1 mg/mi?

Recommendation: Yes, as reported to Board in 2015, mass-based measurement method is accurate and most appropriate



Some vehicles already meeting future PM standards

- Many already meeting 3 mg/mi
- Further refinement needed for many to meet 1 mg/mi



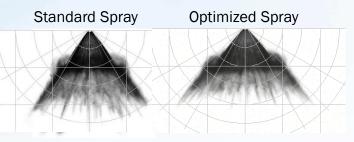
LEV



Combustion technology evolving to meet 1 mg/mi standard

Focus on fuel injection system and combustion chamber design



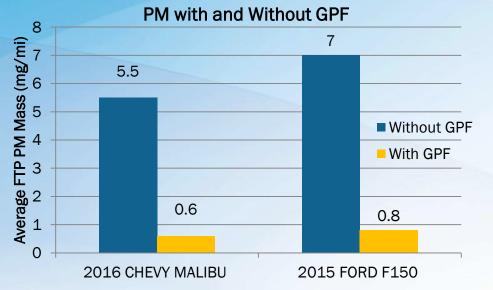




LEV

Gasoline particle filters provide additional technology path

- Prototype catalyzed GPFs tested
 - Can control PM levels below 1 mg/mi on FTP
 - Limited use worldwide



PM Removal Efficiencies

	FTP	US06
F-150	88%	72%
Malibu	88%	54%

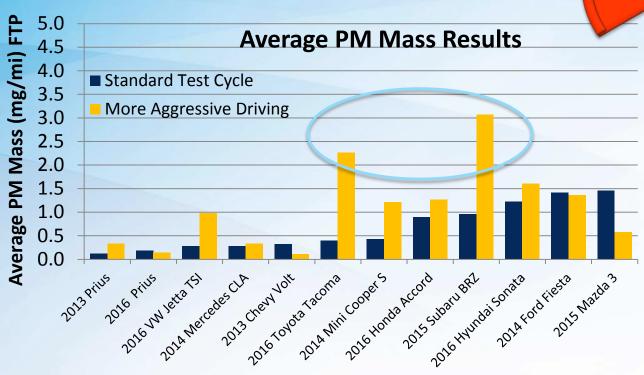




LEV

Real-world PM control varies

More aggressive driving can result in higher emissions





LEV

PM Staff Recommendations

Review Question: Recommendation:

Additional **Recommendation:**

Is the 1 mg/mi standard feasible by 2025? Yes, the standard is feasible and the current *implementation schedule maintains necessary* lead time to refine engine and injection system designs

Develop additional PM standards, to supplement the 1 mg/mi standard, to better ensure robust PM control in real world driving conditions



LEV

Zero Emission Vehicle (ZEV) Regulation

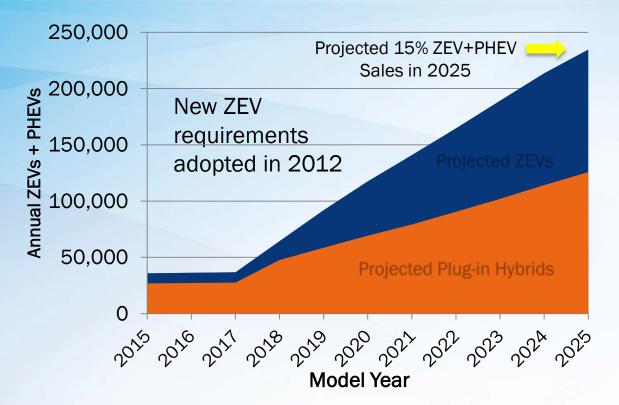
Midterm Review:

Are the ZEV requirements in California appropriate for continuing to help develop the ZEV market?

Midterm Review:

Are the ZEV requirements in Section 177 ZEV states appropriate for continuing to help develop the ZEV market?

How should PHEVs be treated in the ZEV regulation?

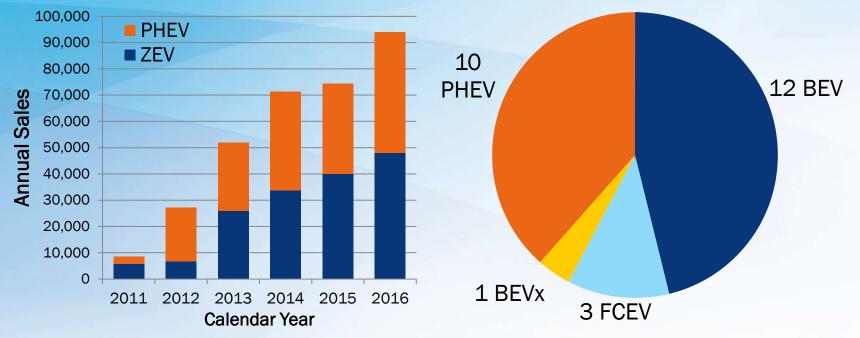


A growing ZEV market

CA + Section 177 New Sales

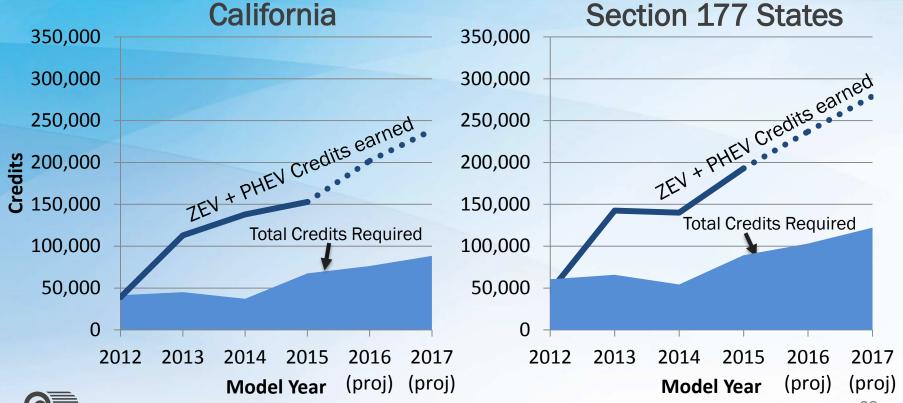
Today's Model Offerings

ZE

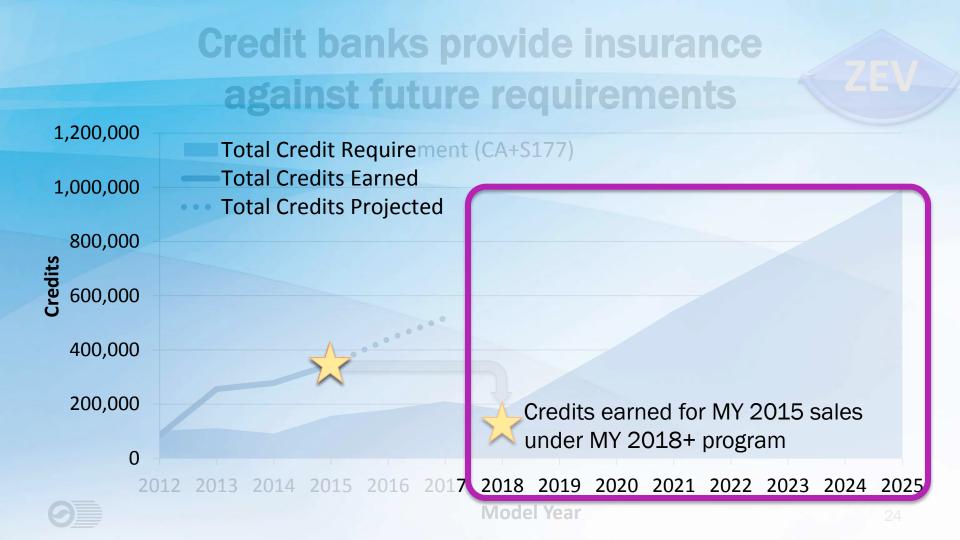




Manufacturers are over-complying

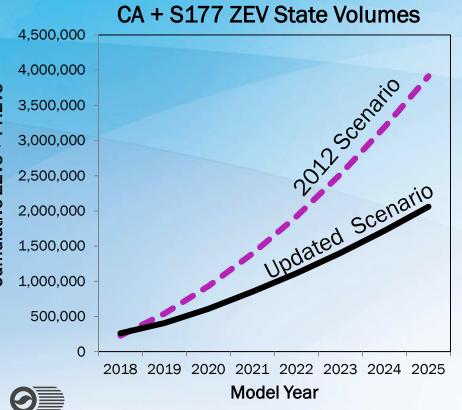


ZEV



Updated ZEV Compliance Scenarios

Cumulative ZEVs + PHEVs



Updates reflect:

- ✓ Increased electric range on BEVs and PHEVs
- ✓ Use of regulatory flexibilities
- ✓ Use of banked ZEV credits
- ✓ Misc. other updates
 - (e.g., total new vehicle sales)

OEMs appear committed to electrification



REUTERS Daimler to make more than 10 electric cars by 2025

Daimler to make more than 10 electric cars by 2025

Two-thirds of overall unit sales should come from plug-in hybrid/hybrid and zero emissions vehicles



Bloomberg

Volvo Cars announces new target of 1 million electrified cars sold by 2025

THE ELECTRIFICATION INITIATIVE OF THE VOLKSWAGEN GROUP

- >30 new pure-electric vehicles by 2025
- Annual unit sales of 2 to 3 million e-cars by 2025, equivalent to 20–25 percent of total sales

VOLKSWAGEN

AUTOMOTIVE NEWS

Hyundai-Kia's grand electrification plan

Korean brands aim to leapfrog past competitors with 26 models by 2020

Ford Investing \$4.5 Billion in

Dec 10, 2015 | DEARBORN, Mich.

Electrified Vehicle Solutions, Reimagining How to Create Future Vehicle User Experiences

Toyota Targets 90% Emissions Reduction by 2050 on Fuel Cells

by **Craig Trudell** and **Yuki Hagiwara** October 13, 2015, 10:14 PM PDT Updated on October 13, 2015, 10:49 PM PDT



CARS & CONCEPTS NEWS BY BRAND

Technology costs falling fast



Fue falle system costs have 7% from 2006 to 2015

Battery costs have fallen 73% from 2006 to 2015

Neither FCEV nor BEV cost parity anticipated with conventional gasoline technology by 2025



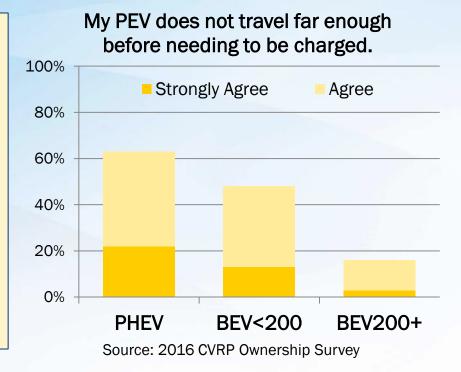
Consumers still need more all-electric range

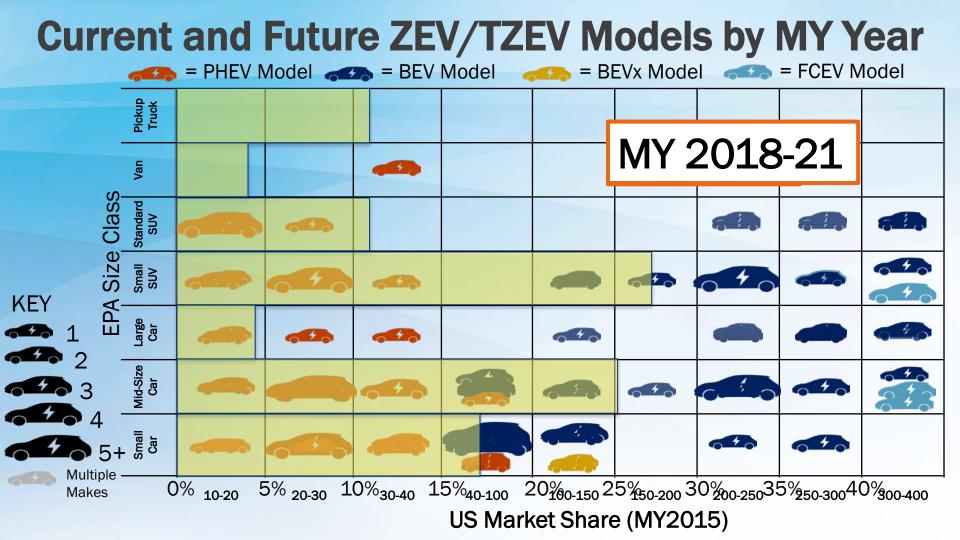


"Range is the most important feature to customers buying EVs, and we know that consideration increases significantly as range goes up."



Pam Fletcher, General Motors
 Executive Chief Engineer





Section 177 State Flexibilities



- CA BEVs allowed to "travel" to S177 states through MY2017, creating credit banks for compliance
- Reduced requirements for PHEVs and BEVs through MY2020
 - Allowed if a few BEVs are delivered prior to 2018
- Pooling amongst states through MY2021 for compliance credits



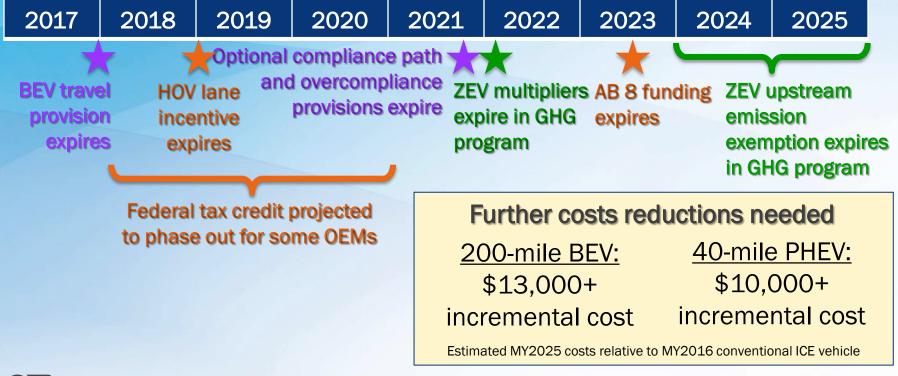


- 2014: Board adopted flexibilities to ease requirements for IVMs
- 2017: All IVMs (Mazda, Subaru, Jaguar Land Rover, and Volvo) have announced electrified products (BEVs and PHEVs) to be released by MY2020

The overall industry is now shifting its electrification focus toward EVs. We are in the age where we cannot just go on launching EVs only as regulation compliance cars. -Yasuyuki Yoshinaga, CEO, Fuji Heavy Industries (which owns Subaru)



Sunsetting policies





ZEN

2018-2025 ZEV Requirements Staff Recommendation

Review Question:

Is the ZEV regulation appropriate as adopted for model year 2018 through 2025?

Recommendation: Yes. Maintain the current ZEV stringency through model year 2025 including the existing regulatory and credit structure in California, the Section 177 States, and for IVMs.



ZE'

Plug-In vehicles and eVMT



Board direction

- How are plug-in vehicles used?
- Are they credited appropriately?
 - What are the criteria pollutant impacts?
 - What are the greenhouse gas impacts?

Data collected from 8 OEMs

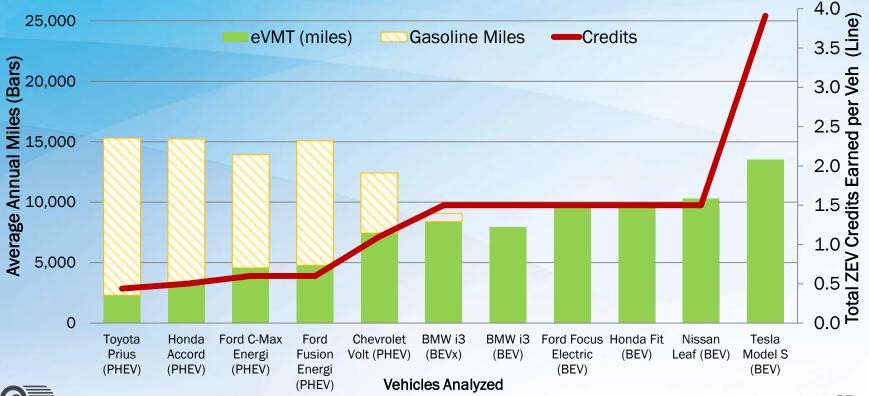
> Over 90,000 vehicles

➢ 11 different models

 Over 20 million miles of triplevel data

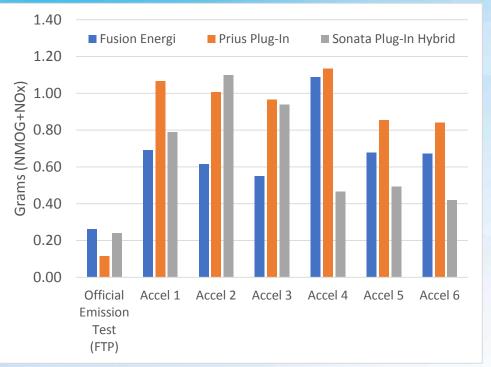


Credits are consistent with usage



ZEV

Criteria Pollutant Considerations for PHEVs



- Testing found some real world engine starts can have significant emissions
 - 2-5x higher
- Vehicle technology improvements are needed to minimize emissions



PHEV eVMT usage depends on consumer behavior

"My main purpose for purchasing it was the HOV sticker. I'm very happy with the car, but I don't charge it very often. If it got more mileage off a charge, I would charge it more."

-2013 Ford C-MAX Driver

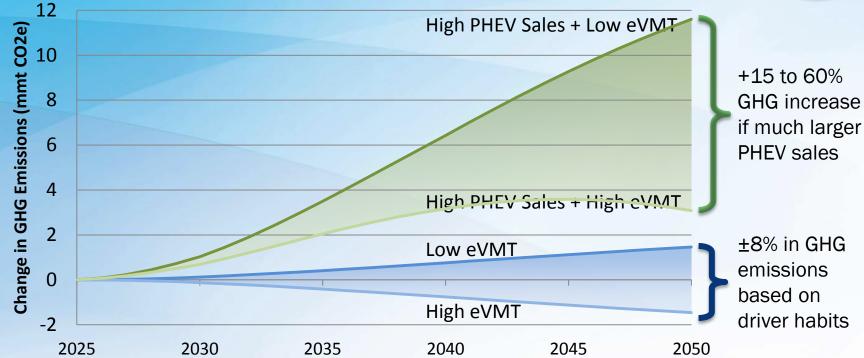
"Love the car, more Level 2 destination chargers and ability to charge at home without pushing into the highest rate tiers are my biggest issues. Currently the price of gas is less than comparable charging cost (break even around \$3-4/gal) so I don't charge much right now."

-2013 Toyota Prius Plug-in Driver

Source: 2016 CVRP Ownership Survey, open-ended final comments



PHEV GHG emissions can be highly variable



PHEVs Role and Usage Staff Recommendation



Recommendation: Yes. Maintain existing credit structure and credit caps for PHEVs through MY 2025



ZEV: Stakeholder Concerns



- Section 177 Dealers: concerned OEMs will require them to take delivery of more ZEVs than they can readily sell
- Auto Industry: concerned about PHEV credits, S177 state markets, support for complementary policies



Alternatives for increased ZEV stringency



- Increase stringency with focus on pure ZEVs (BEVs, FCEVs)
- Require PHEVs with greater all-electric functionality
- Add credit usage restrictions



New complementary policy actions needed to accelerate ZEV Market

Challenge	Complementary Policy
Low consumer awareness	 New consumer education campaigns VW Appendix C: ZEV awareness campaign
Shortage of fueling	 SB 350: Electric utility investments VW Appendix C: Electric infrastructure

infrastructure

- - investments
- Hydrogen grants for traditional energy firms



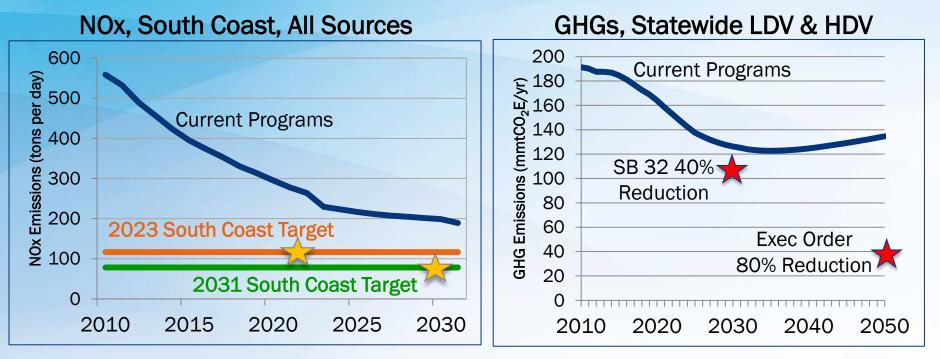


2026 and beyond

Evolution of the light-duty vehicle emission program

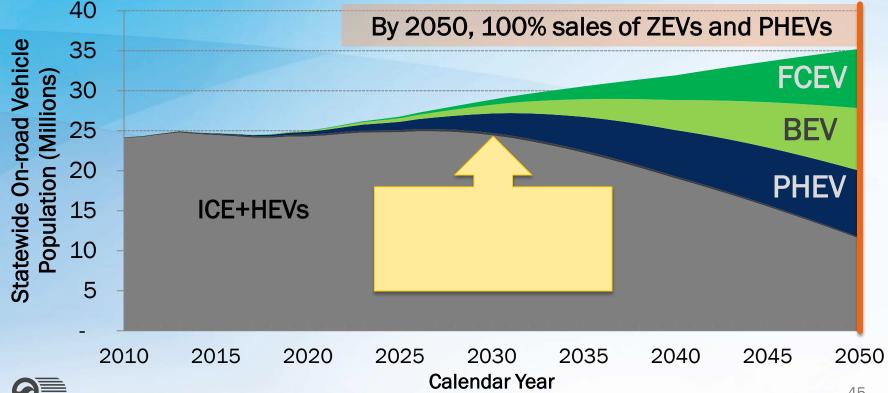


Need large emission reductions beyond current programs





Mobile Source Strategy & Scoping Plan Re-affirm Need for ZEVs & Clean Cars



Tracking published literature for 2026 and Beyond

American Lung Association (Oct 2016)

- Large public health and climate benefits from ZEV fleet expansion
 Environmental Defense Fund (Feb 2017)
- Feasibility of 10-90 gCO2/mi reductions between 2025 and 2030 International Council on Clean Transportation (Mar 2017)
- Feasibility of 4%-6% annual reductions in GHG emissions by 2030 Indiana University (Mar 2017)
 - Combined GHG and ZEV regulations can have long-run positive economic impacts



2026 and beyond: Thinking "Outside the Box"

Early considerations:

• Should fuels be addressed in the regulations?

Broader considerations:

- What is best structure of GHG and criteria emission stds to accelerate necessary technologies like ZEVs?
- Should vehicle regulations include elements for new transportation systems?
- Should the ZEV regulation be expanded to include heavier vehicles?

2026 and beyond: Guiding Principals and Approach

- Maximize emission reductions long-term cost effectively
- Maintain tech forcing requirements as long as barriers exist
- Learn from other jurisdictions, including Europe & Asia
- Consider transition from current rule to new rule
- Leverage partnerships
- Board proposal within 3-4 years for model year 2026 start



Midterm Review Recommendations Summary

- Adopted MY 2022-2025 GHG standards remain appropriate
- PM standard is feasible but further action needed to ensure robust control
- Continue with existing technology-forcing ZEV requirements to develop the market
- Direct staff to immediately begin rule development for MY 2026 and beyond

