



January 16, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted via ACC docket and email to cleancars@arb.ca.gov

Re: CalETC Comment on Advanced Clean Cars Workshop November 15, 2023

Dear CARB Staff:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide our feedback on the concepts presented during the November 15, 2023 Advanced Clean Cars II (ACC II) Workshop.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

With regard to the questions raised by CARB on interoperability, CalETC recommends CARB and the CEC hold a joint workshop on interoperability and present a joint vision to achieve the CEC's stated goal of widespread interoperability. Both agencies are looking to address reliability and interoperability, and the industry needs clear signals on how these complex problems will be addressed in an organized and methodical manner. If CARB decides to adopt standards, we recommend conformance testing be done by the automakers to self-certify to these standards. All automakers currently self-certify existing standards, which is industry practice for many regulatory standards, including emissions standards. Self-certification is the most efficient way for automakers to certify conformance with these standards and will avoid increasing costs or delaying vehicle availability.

The CEC funded the DEKRA Vehicle-Grid Innovation Lab (ViGIL) in Concord, California, which provides ISO 15118 conformance testing. Similarly, the American Center for Mobility in Michigan conducts interoperability testing. These regional testing facilities fulfill the role of testing and confirming that protocols are being implemented correctly. The CEC has also proposed to fund an

California Air Resources Board

January 15, 2024

Re: CalETC Comment on Advanced Clean Cars Workshop November 15, 2023

Page 2

interoperability testing facility called the Charging Interoperability and Collaboration Yard (Charge Yard), which would be an ongoing industry collaboration supporting interoperability, standards development and certification, and developing the next generation of charging features. As part of the joint workshop we recommended above, we recommend CARB and the CEC develop a strategy to integrate testing and certification sites like ViGIL and Charge Yard into the overall strategy to achieve widespread interoperability.

CalETC understands that CARB is considering modifications to the existing Environmental Performance Label (EPL) requirements to add range, charging speed and efficiency for battery electric vehicles (BEVs) and plug-in hybrid electric vehicles (PHEVs). The current EPL regulation allows manufacturers to comply with California's requirements by utilizing the Federal Fuel Economy and Environmental label. While we recognize that the Federal Fuel Economy and Environmental Label is not particularly useful for BEVs, we caution against requiring new labels that would increase the costs for testing and reporting. To that end, we recommend that CARB work closely with the automakers to inventory the testing and data that is already available and utilize that existing data to provide better information for consumers. Furthermore, CARB should also work closely with USEPA to ensure that any new label requirements can be implemented on all vehicles across the United States, to avoid duplicative or conflicting information that could cause customer confusion.

Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions at laura@caletc.com.

Sincerely,



Laura Renger
Executive Director
California Electric Transportation Coalition