

To: All Manufacturers of Medium-Duty and Heavy-Duty Vehicles
From: Sydney Vergis, Chief, Mobile Source Control Division *Sydney Vergis*
Date: March 22, 2022
Subject: Manufacturers Advisory Correspondence (MAC) 2022-02
Advanced Clean Trucks (ACT) Regulation Sales Reporting

This letter transmits a MAC that outlines the process for meeting the sales reporting requirements of the ACT regulation. The ACT regulation is part of a holistic approach to accelerate a large-scale transition of zero-emission medium and heavy-duty vehicles. Manufacturers who certify chassis or complete vehicles with a gross vehicle weight rating greater than 8,500 lbs. are required to sell zero-emission vehicles as an increasing percentage of their annual California sales of vehicles starting with the 2024 model year. Reporting begins with the 2021 model year. The first report is due by March 31, 2022, and each successive annual report is due no later than 90 days following the end of each model year.

This MAC provides guidance on the regulatory requirements necessary to demonstrate compliance, to meet reporting requirements, and recommendations on how to submit required sales information. It provides guidance on a common method and format to be used when reporting vehicle sales.

For questions concerning ACT reporting requirements, please email the [ACT reporting team](#) (actreporting@arb.ca.gov) or call (866) 643-3735.

Manufacturer Advisory Correspondence 2022-02

Reporting for the Advanced Clean Trucks Regulation

This summary describes the [Advanced Clean Trucks \(ACT\) reporting requirements](https://ww3.arb.ca.gov/regact/2019/act2019/fro2.pdf) (<https://ww3.arb.ca.gov/regact/2019/act2019/fro2.pdf>) and recommendations on how to submit required information for vehicles produced and delivered for sale in California.

Who is required to report?

Any vehicle manufacturer that produced and delivered for sale more than 500 on-road vehicles with a gross vehicle weight rating over 8,500 lbs. into California or into any state that adopted the ACT regulation. Manufacturers that annually produce and deliver for sale 500 vehicles or less into California may elect to voluntarily report to generate zero emission vehicle (ZEV) credits and near-zero emission vehicle (NZEV) credits.

When does reporting begin?

Reporting in California begins with the 2021 model year. The first report is due by March 31, 2022, and each successive annual report is due no later than 90 days following the end of each model year.

What type of information is required for annual sales reporting?

For each vehicle produced and delivered for sale, the following is a summary of the information to be reported:

1. Vehicle Identification Number (VIN)
2. Vehicle weight class
3. Vehicle fuel type
4. Drivetrain type
5. Model year
6. If an NZEV, the tested all-electric range of the vehicle
7. For class 2b-3 vehicles, is the vehicle being reported for credit in the Advanced Clean Cars Regulation?
8. State of sale
9. Was the vehicle produced by a manufacturer with a low volume exemption?
10. Were the zero emission powertrain certification requirements met?
11. Was the vehicle sold to an ultimate purchaser? (optional)

How do I submit my vehicle information?

The ACT reporting portal is currently being developed for uploading data from a template spreadsheet. The template can be used to report the number of vehicles produced and delivered for sale in California and other states with a single upload of the data file. A suggested ACT reporting spreadsheet template will be available on the [ACT manufacturer reporting website](https://ww2.arb.ca.gov/our-work/programs/advanced-clean-) (<https://ww2.arb.ca.gov/our-work/programs/advanced-clean->

trucks/manufacture-reporting) with instructions on how to upload the completed ACT reporting template. The ACT template is patterned on the EPA Phase II production volume reporting template and uses some of the same fields. An example spreadsheet with details of what data to submit and the format to be used is described at the end of this document.

Manufacturers will need to register through the ACT reporting portal and complete a company profile to receive a manufacturer ID and access the reporting system. If the upload feature is not available by the March 31, 2021, deadline, you may send the completed spreadsheet to the [ACT Reporting email address](mailto:actreporting@arb.ca.gov) (actreporting@arb.ca.gov).

Can I report summary information instead of for each vehicle?

Yes, manufacturers have the option to report internal combustion engine (ICE) vehicle information for the number of vehicles produced and delivered for sale in California grouped by category without providing individual VINs. This summary reporting option is not needed if already reporting all individual vehicle sales. Using this option does not excuse the manufacturer from reporting information for individual ZEV and NZEV sales.

Can credits be traded between manufacturers?

Vehicle sales to the ultimate purchaser must be verified before credits can be traded. Any ZEV credits and NZEV credits transferred or received between two registered manufacturers must be documented and reported before they can be used to demonstrate compliance. The documentation for the transaction may be in the form of a letter signed by the responsible official for each of the manufacturers involved and must contain the following information:

1. Corporate name of credit transferor
2. Corporate name of credit transferee
3. Number of ZEV credits and or NZEV credits transferred for each model year, rounded to the nearest tenth
4. Indicate whether the ZEV or NZEV credits are Class 7-8 tractor credits

Upon receipt of the credit transfer documentation, staff will populate the credit trading information in the ACT reporting database for the two registered manufacturers.

How is ultimate purchaser defined?

Ultimate purchaser is defined in California Health and Safety Code §39055.5. Ultimate purchaser "means, with respect to any new motor vehicle or new motor vehicle engine, the first person who in good faith purchases a new motor vehicle or new motor engine for the purposes other than resale."

How will reported information be displayed?

The intent is to have a reporting tool for each manufacturer to upload and verify the information reported. The reporting system is being designed to display credits and deficits. The information would include projected credits and deficits based on reported information

of vehicles produced and delivered for sale in California and credits and deficits earned based on confirmed sales to the ultimate purchaser.

How are credits and deficits earned?

The vehicle manufacturer of record is the party that can earn credits and deficits. ZEV credits, NZEV credits, and deficits are earned when the vehicle produced and delivered for sale and has been reported as sold to the ultimate purchaser.

When do Zero-Emission Powertrain certification requirements apply?

Beginning with the 2024 model year, on-road ZEVs over 14,000 pounds GVWR and incomplete medium-duty ZEVs from 8,501 through 14,000 pounds GVWR produced and delivered for sale in California must meet the requirements of the Zero-Emission Powertrain Certification regulation to receive ZEV credit. More information about these certification requirements can be found on the [Zero-Emission Powertrain Certification program webpage](https://ww2.arb.ca.gov/our-work/programs/zero-emission-powertrain-certification) (<https://ww2.arb.ca.gov/our-work/programs/zero-emission-powertrain-certification>).

How are sales to leasing companies treated?

Credits and deficits are earned when the vehicle produced and delivered for sale and the vehicle has been reported as sold to the ultimate purchaser. When a leasing company purchases a truck to be used for renting and leasing to others and is not reselling the vehicle, then the leasing company is the ultimate purchaser. Therefore, a vehicle produced and delivered for sale and shipped to a leasing company for its own use should be reported as sold to the ultimate purchaser in California.

What format should I use for reporting sales information?

The [ACT reporting templates](https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/manufacture-reporting) (<https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/manufacture-reporting>) identify the data format to use for uploading sales information into the online database. All data fields are required unless noted otherwise and need to follow the suggested format for the data upload to work. Example data fields with allowable entries are displayed on the following pages.

Table 1 - Sample Vehicle Information Template

Data Field	Required Value or Conventional Standard
VIN	123ABC456XYZ78900 (Alphanumeric example)
Vehicle Fuel Type	CNG = Compressed natural gas D = Diesel E = Ethanol, greater than 85% EL = Electricity G = Gasoline, including blends up to E85 H = Hydrogen LNG = Liquefied natural gas LPG = Liquefied petroleum gas M = Methanol
Drivetrain Type	EV = Electric vehicle FC = Fuel cell vehicle NZEV = Near zero-emission vehicle O = Other
Is the ZEV zero-emission powertrain certified?	Y = Yes N = No NA = Not applicable
Model Year	2021 (Numeric value example)
Vehicle Classification	C2b3 = Class 2b-3 C45 = Class 4-5 C67 = Class 6-7 (excluding Class 7 tractor) C8S = Class 8 and yard truck (excluding other tractors) C78T = Class 7-8 Tractor
NZEV – All Electric Miles	50 (Numeric value example) NA = Not Applicable
Credit for ACC (Class 2b-3)	Y = Yes N = No
Sold to Ultimate Purchaser?	Y = Yes N = No (Blank)
State of Sale	CA, MA, NJ, NY, OR, WA
Low Volume Exemption Applies	Y = Yes N = No

Table 2 - Sample ACT Production Delivery Reporting Template

VIN	Fuel Type	Drivetrain Type	Zero-Emission Powertrain Certified	MY	Vehicle Class	NZEV AER	Credit for ACC	Sold to Ultimate Purchaser (optional)	State of Sale	Low Volume Manufacturer Exemption
123ABC456XYZ78900	D	O	NA	2021	C2b3	(BLANK)	N	N	CA	N
123ABC456XYZ78901	D	O	NA	2021	C2b3	(BLANK)	N	N	CA	N
123ABC456XYZ78902	D	O	NA	2021	C2b3	(BLANK)	N	Y	CA	N
123ABC456XYZ78903	EL	EV	Y	2021	C2b3	(BLANK)	N	Y	CA	N
123ABC456XYZ78904	EL	EV	Y	2021	C45	(BLANK)	Y	Y	CA	N
123ABC456XYZ78905	EL	NZEV	NA	2021	C45	50	Y	Y	CA	N
123ABC456XYZ78906	H	FC	Y	2021	C45	(BLANK)	Y	Y	CA	N
123ABC456XYZ78907	EL	EV	Y	2021	C45	(BLANK)	Y	Y	NY	N
123ABC456XYZ78908	EL	NZEV	NA	2021	C45	50	Y	Y	NY	N
123ABC456XYZ78909	H	FC	Y	2021	C45	(BLANK)	Y	Y	NY	N

Table 3 - Sample ACT Grouped Sales Reporting Template for Internal Combustion Engine Vehicles

Vehicle Class	Fuel Type	MY	Sold to Ultimate Purchaser (optional)	State of Sale	Vehicle Count
C2b3	G	2021	N	CA	300
C2b3	G	2021	Y	CA	2700
C45	D	2021	Y	CA	5000
C45	D	2021	N	CA	400
C67	D	2021	Y	CA	100
C2b3	G	2021	(BLANK)	NY	200
C45	D	2021	(BLANK)	NY	700
C67	D	2021	(BLANK)	NY	500