

To: All Manufacturers of Medium-Duty and Heavy-Duty Vehicles
From: Sydney Vergis, Chief, Mobile Source Control Division
Date: March 22, 2023
Subject: Manufacturers Advisory Correspondence 2023-01
Advanced Clean Trucks Regulation Sales Reporting

This letter transmits a manufacturers advisory correspondence (MAC) that outlines updates to the Advanced Clean Trucks (ACT) reporting process for manufacturers. Several improvements have been made to streamline manufacturer submittals of 2022 and 2021 model year sales data.

The ACT Reporting System (ACTRS) is a new reporting tool which will provide secure user logins, real-time data validation, automatic credit and deficit calculations, and interactive dashboards. Other modifications include minor revisions to the ACT Reporting Templates such as disaggregating vehicle class groupings to increase data granularity.

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 starting with the 2024 model year. Reporting began with the 2021 model year. The 2022 vehicle model year report is due March 31, 2023, 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 vehicle sales information online.

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

Manufacturer Advisory Correspondence 2023-01 Reporting for the Advanced Clean Trucks Regulation in 2023

This summary describes the [Advanced Clean Trucks \(ACT\) reporting requirements](http://ww3.arb.ca.gov/regact/2019/act2019/fro2.pdf) (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 (GVWR) over 8,500 lbs. into California is required to report. 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 is the 2022 vehicle model year report due?

The 2022 vehicle model year report is due by March 31, 2023, and each successive annual report is due no later than 90 days following the end of each model year.

What vehicle sales do I report?

Manufacturers must report sales of vehicles delivered for sale into California with a GVWR greater than 8,500 lbs. except for certain excluded buses. Excluded buses have a GVWR greater than 14,000 lbs. and a load capacity of 15 or more passengers, but are not school buses as defined in California Vehicle Code §545 and are not cutaway buses as defined in 13 CCR §2023(b)(17). Examples of excluded buses are transit buses, motor coaches, articulated buses, and double decker buses.

How do I report my vehicle information?

Manufacturers can login to their ACTRS account and upload sales data by using reporting templates. Detailed reporting information and templates can be found in the [ACTRs user guide](http://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/manufacture-reporting) (ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/manufacture-reporting). Email [ACT Reporting staff](mailto:ACTReporting@arb.ca.gov) (ACTReporting@arb.ca.gov) if you need an account to be set up for you.

What type of information is required for annual sales reporting?

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

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?

How do I submit my vehicle information?

This year, manufacturers can upload their information online by using the new reporting system [ACTRS](http://www.arb.ca.gov/actrs) (www.arb.ca.gov/actrs). ACTRS is a web application that provides secure user logins, real-time data validation, duplicate VIN checks, and interactive dashboards that allow users to view reported sales data. A user guide is available on the [ACT manufacturer reporting website](http://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/manufacture-reporting) (ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks/manufacture-reporting). It provides manufacturers with step-by-step instructions on how to upload vehicle sales data, navigate the reporting system, and use system features.

How are credits and deficits accrued?

Credits and deficits are accrued when a vehicle is delivered to the ultimate purchaser in California. However, we recognize that all sales for a given model year will not be delivered to the ultimate purchaser by the time the first annual report is due for the applicable model year. Future updates will be necessary until all sales for the model year are completed and compliance can be determined. ACTRS shows the total credits and deficits that are earned for vehicles that have been reported as sold to the ultimate purchaser in California.

Because sales of given model year will likely occur after the initial report, ACTRS also shows the projected credits and deficits for vehicles that have been reported as delivered for sale in California whether or not the vehicle has been sold to the ultimate purchaser. These projected credits and deficits help identify whether a manufacturer is on track to comply for the model year. The projected credits and deficit calculations assume all of the vehicles that are delivered for sale in California will be sold and delivered to the ultimate purchaser in California.

What information should I report by March 31, 2023?

This year we are asking manufacturers to submit a new data set with updated 2021 model year sales and 2022 model year sales for each vehicle that is delivered for sale in California. ACTRS is able to update individual vehicle sales information when uploading new information about an individual vehicle sale by using the VIN as the unique identifier. If you have any questions or would like us to reinstate last year's data for 2021, please email [ACT Reporting staff](mailto:ACTReporting@arb.ca.gov) (ACTReporting@arb.ca.gov).

What format should I use for reporting sales information?

The ACT reporting templates provide the correct data format for uploading sales information into ACTRS. The data from the templates needs to be saved in a ".csv" file before uploading

it. ACTRS will only accept the upload if all required data fields are populated, and the correct data format is used.

Can I report grouped vehicle sales information?

The regulation includes an option for manufacturers to report grouped information for internal combustion engine sales, but they must still report individual vehicle sales for ZEVs and NZEVs. However, we cannot verify vehicle sales to the ultimate purchaser without vehicle specific information, and any updates to prior model year sales cannot be made without replacing the entire dataset for that model year. For these reasons, we are not recommending this option to be used. However, if you prefer to report grouped data, please email [ACT Reporting staff](mailto:ACTReporting@arb.ca.gov) (ACTReporting@arb.ca.gov) to obtain the group reporting template. Please note that we plan to request individual vehicle sales data from all manufacturers after the reporting period ends per 13 CCR §1963.4(e) to validate individual vehicle sales information.

Who is the ultimate purchaser and how are credits and deficits earned?

Per California Health and Safety Code section 39055.5, the 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.”

Credits/deficits are accrued when the vehicles are sold to ultimate purchasers in California. The manufacturer must track sales so that it’s clear whether or not the vehicles are delivered and placed in service in California. Per 13 CCR §1963.4(d), documentation showing vehicle delivery to the ultimate purchaser at a location in California must be kept by manufacturers for CARB to audit for a period of eight years from the end of the model year the vehicles were produced. Although registration state is an indicator of where a vehicle is placed in service, it is not the determining factor.

Who is the manufacturer of record?

The manufacturer of record is the manufacturer that holds the CARB issued Executive Order for the certified vehicles meeting applicable emissions standards. The purpose of the ACT regulation is to reduce greenhouse gasses and harmful emissions from on-road medium- and heavy-duty vehicles. Accordingly, ACT credit/deficit values are based on weight class modifiers which account for the emissions associated with the size and weight of the vehicle. ACT credits/deficits are assigned to the manufacturers responsible for the emissions output of the vehicles produced.

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. However, if a bank or leasing company that is financing the purchase of a truck through a loan or a lease agreement with an option to purchase the ultimate purchaser of the truck is the person or entity with the right to take ownership of the vehicle.