



# **2024 Truck and Engine Manufacturers Association Compliance Workshop**

**General Compliance Session – New Vehicle Certification Topics**

**April 24, 2024**

# Mobile Source Certification Fee Changes Ahead

Certification Fee amount changes every MY until MY25

- These changes will be reflected at the time of invoice submittal

Base / Carryover / Partial Carryover (For Certification Fee)

- The definitions under 13 CCR 2901

Mailout coming August 2024 for 2026MY/2025CY changes

Streamlined Carryover / Partial Carryover Process (For Applications)

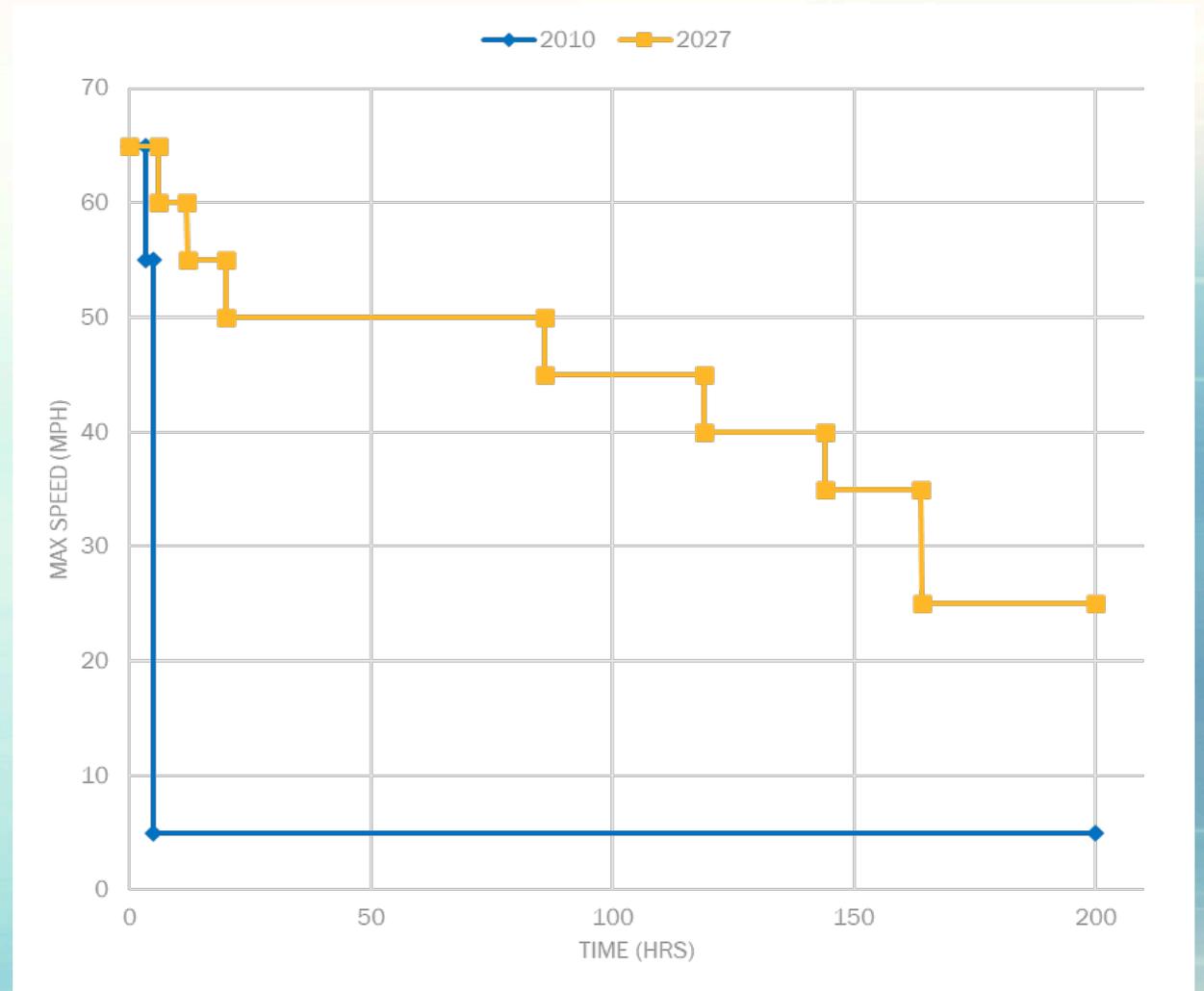
- Mail-Out # ECARS 2015-7

# Database Access

- Q: Does CARB plan to allow for individual access to E-File without restriction as opposed to the current corporate limit of 3 logins/vault? Is this tied to the development of E-Cert ? Is there planned linkage of E-file with E-Cert?
- A: E-File will continue to operate as usual with 3 logins/vault. If there is a business need for more than 3, please discuss with CARB accordingly. E-Cert and E-file will not be directly linked. E-Cert will now be a part of the requirements for a complete application like the warranty and label documents.

# MY27 SCR Inducement Strategy Changes

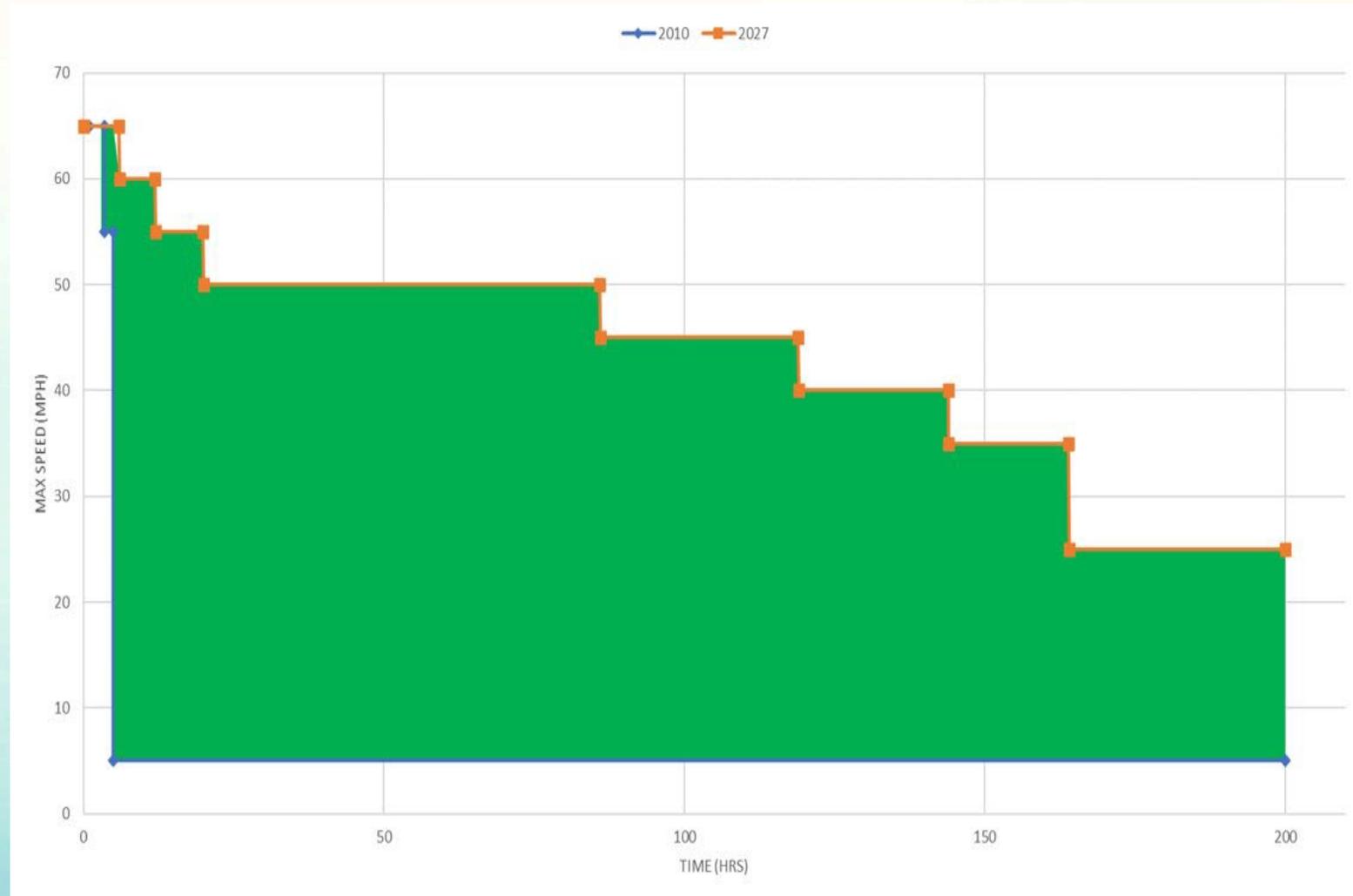
For MY27 and onward, CARB plans to fully align with EPA's proposal, this includes in-cab display requirements.



# Pre MY27 SCR Inducement Strategies

For MY24-MY26, CARB and EPA are available to discuss the following:

- Inducement schedules that operate within the green area.
- EPA's in-cab display requirements



# Post-Production Reports

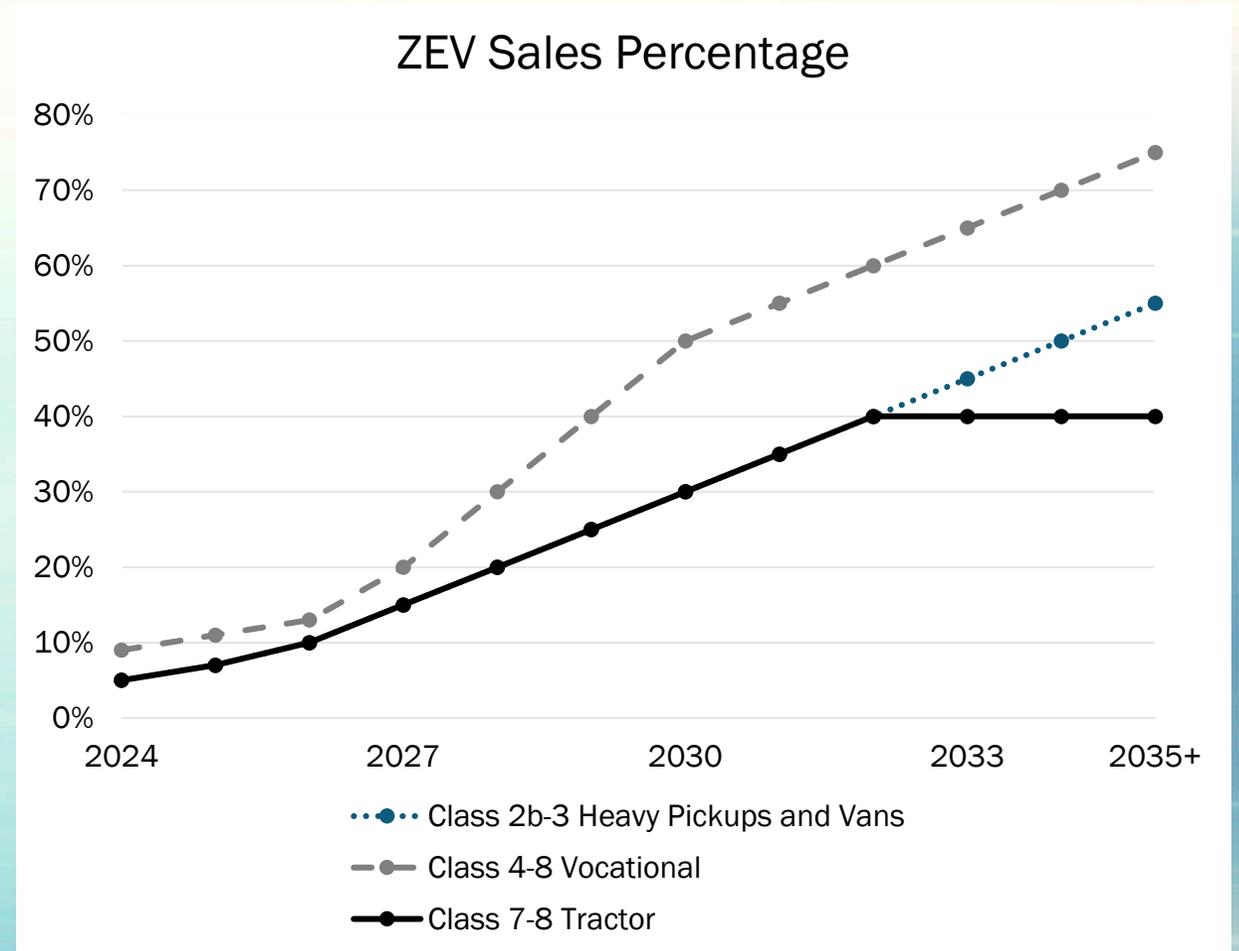
- Q: Does CARB anticipate additional updates to the NOx reporting template or any other templates? If so, when are these updates expected to be released? Can CARB communicate updates to templates to manufacturers in advance of implementation?
- A: CARB CIHD does anticipate to have updates to the production and ABT templates applicable for MY24 reporting requirements and onward. We expect to have these completed by June 2024. We are working on a notification system so that manufacturers are made aware of the updates and when they are required for implementation.

# Tier 5 Implementation

- Q: If California has a Tier 5 regulation separate from EPA, will an engine with California-only EO (no EPA certification), be permitted to be:
  - Sold in California?
  - Sold in other states that opt-in to California standards?
  - Sold in other states that have NOT adopted California standards?
- A: For implementation of regulations that have not been adopted we suggest manufacturers reach out to our Tier 5 regulation development group at [tier5@arb.ca.gov](mailto:tier5@arb.ca.gov) to voice specific concerns and clarify specific questions.

# Advanced Clean Trucks (ACT) Regulation

- Manufacturers to sell zero-emission vehicles (ZEV) in all vehicle classes as a percentage of total sales\*
- Credit for pre-2024 sales
- 320,000 ZE trucks to California by 2035
- Board resolution setting 2035, 2040, and 2045 fleet goals



# Current Status of ACT Regulation

- Met 2024 requirement in 2022 – two years ahead of schedule
  - Abundance of credits expected for 2024 model year
- Numerous flexibility provisions
  - Early credit provisions
  - Banking and trading credits
  - Deficit carryback
- 10 other states have adopted the ACT regulation
  - 25% of US truck sales
- Expanding flexibility in proposed ACT Amendments
  - Board consideration in May 2024



Advanced Clean Trucks Compliance and Incentives Update Link:

<https://ww2.arb.ca.gov/resources/documents/advanced-clean-trucks-compliance-and-incentives-update>

# Zero Emissions Vehicle Certification

## **PATH 1: Enhanced Vehicle EO**

- STEP 1
  - A. Certify your ZEP families per the CA ZEP Test Procedures.
  - B. Or, use an already-certified ZEP by a different manufacturer.
- STEP 2
  - A. Certify your ZEV families using enhanced certification requirements.

## **PATH 2: Standard Vehicle EO**

- Certify your vehicle families using the standard Phase 2 GHG certification procedure.

# Zero Emissions Vehicle Certification (Contd.)

## Some issues/reminders

- Rated Energy Capacity Test for Battery-Electric Powertrains: if an alternative test procedure is used other than the SAE J1798 procedure, pre-approval is needed prior to submitting certification application.
- The Enhanced Electric and Fuel-Cell Vehicle Certification requires additional documents compared with the standard GHG certification (CA test procedure 1037.115 B. California Provisions).
  - Malfunction Information
  - Trip Meter
  - Required Access for Diagnostic Communications Tools Compatibility
  - Readily Accessible of Rated/Usable Energy Capacity (BEV)
  - Availability of Tools description
  - Sales Disclosures
  - Owner's Manual

# California-Only Averaging, Banking, and Trading (CA-ABT) program

## (Heavy-Duty Zero-Emission Averaging Set)

- ZEP/ZEV families with models used in class 4 through 8 vehicles are eligible to generate criteria pollutant (e.g. NOx) credits starting from model year 2022.
- For 2024 through 2026 model years, the heavy-duty ZEP family must be certified under title 13, CCR, section 1956.8(a)(8). The ZEP manufacturers earn the credit.
- Credit Life: only up through model year 2026.
- Please use CARB's template to calculate and report CA-ABT Credits. The reports need be submitted within 180 days of the end of the model year (June 30, 2024) for 2023 MY. The template can be found at: [CA NOX-PM-NMHC MY2022 ABT Reporting Template Revision 3 12212023\\_0.xlsx \(live.com\)](#).

# California-Only Averaging, Banking, and Trading (CA-ABT) program (Contd.)

(Heavy-Duty Zero-Emission Averaging Set)

- Manufacturers can generate their own ECF or use the default values provided in the template.
- Manufacturers who trade the credits need to fill in the “sum tab” inside the template included in the end-of-year report for the following Model Year. Copies of contracts related to credit trading must also be included or supplied by the broker if applicable.

# Reminders

- Submit applications early– At least 90 days before start of production.
- Review all applicable regulations including CARB amendments to EPA regulations in 40 CFR 1037.
- Cert fees must be paid prior to submitting applications for review. For ZEP applications, the fee is based on calendar year, instead of Model Year.
- Manufacturers are reminded to submit 2023MY end of year reports.
  - (1) total U.S.-directed production and (2) CA production reports (\*90 days from end of production) and . \*\*Since EPA has extended the deadline to September 30 following the MY we will accept updates until that date\*\*
  - ABT (CO<sub>2</sub>) (90 days and 270 days from end of production)
  - CA-ABT (criteria pollutant)(180 days from end of production)
- Please use CARB Phase 2 ABT (CO<sub>2</sub>) Report Template (will be updated by June 2024 for 2023MY) and CA-ABT (criteria pollutant) Report Template (December 2023) when reporting ABT credits.
- Please review all relevant regulations related to reporting.

# Reminders (Contd.)

- ZEP Family Naming Convention should follow the family naming conventions provided in the Mail-Out #ECC 2020-04.
- ZEP EO must be signed prior to the issuance of Enhanced Vehicle EO.
- Starting from MY2023, manufacturers are required to provide VECI label samples for anti-tampering testing. New testing is required if label manufacturer, material etc changes.
- Vehicles equipped with non-CA certified engines should not say “THIS VEHICLE COMPLIES WITH CALIFORNIA’S REGULATIONS” on the VECI label.

# Air Conditioner Review

Q. Delays related to the CARB AC (Air Conditioner) System review and approval process are creating delays in achieving vehicle certification. Can the AC system review process be streamlined/improved to address these delays?

A: We understand and are working to streamline the process

- A/C docs can be submitted before the main vehicle family applications
- Mfrs must ensure consistency in documents (e.g. between the schematic and the SAE spreadsheet)
- Submissions of running changes near the end of the MY creates delays.

# Annual Reports

- Q: Can CARB publish annual statistics on technology take rates related to vehicle standards, to identify the most highly utilized technologies?
- A: Something we can look into based on workload. 23MY reports are finalized in October 2024, a report maybe early 2025.

# Contact Information

New Vehicle and Engine Programs Branch

**Shobna Sahni, Branch Chief**

(951) 542-3369 [Shobna.Sahni@arb.ca.gov](mailto:Shobna.Sahni@arb.ca.gov)

Emissions Certification and Compliance Division

**Robin Lang, Division Chief**

(951) 542-3239 [Robin.Lang@arb.ca.gov](mailto:Robin.Lang@arb.ca.gov)

Compression Ignition and Heavy-Duty  
Certification Section

**Elena Florea, Manager**

(916) 718-5942 [Elena.Florea@arb.ca.gov](mailto:Elena.Florea@arb.ca.gov)

Heavy-Duty Green House Gas  
Certification Section

**Lucky Benedict, Manager**

(951) 542-3082 [Lucky.Benedict@arb.ca.gov](mailto:Lucky.Benedict@arb.ca.gov)

# Questions?