

July 26, 2024

Via Email: [cleancars@arb.ca.gov](mailto:cleancars@arb.ca.gov)

Via Docket: <https://ww2.arb.ca.gov/public-comments/comment-log-advanced-clean-cars-ii-amendments-june-workshop>

Ms. Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Hyundai's Comments to the California Air Resources Board's Advanced Clean Cars II Amendments Workshop on June 26, 2024

Dear Chair Randolph:

Hyundai Motor America ("Hyundai") appreciates the opportunity to comment on the California Air Resources Board's ("CARB") Advanced Clean Cars II ("ACC II") Amendments Workshop held on June 26, 2024.

As the first legacy automaker to offer a full suite of electrified vehicles, Hyundai has demonstrated an enduring commitment to electrification. We continue to build on this foundation by expanding our hybrid, plug-in hybrid, battery electric and fuel cell electric vehicle line up – both in terms of model offerings and volume increases. Hyundai sees a path to full electrification, but not without challenges ahead. Changing consumer sentiment among *all* new car shoppers takes tremendous time and effort, particularly in the areas of ZEV infrastructure ubiquity and reliance, electric grid resiliency, battery-ICE price parity, financial incentives and related supporting policies. Future rules should clearly account for and reflect these challenges. This letter provides Hyundai's preliminary feedback to CARB's proposed ACC II amendments as presented at the workshop.

### **Criteria Air Pollutant Standards**

Hyundai aligns with the Alliance for Automotive Innovation ("Auto Innovators") and Hyundai America Technical Center, Inc. ("HATCI") comments for the Light-Duty Criteria Air Pollutant Standards. See Attachment A for HATCI's Comment Letter. We support CARB's decision to not modify the NMOG+NOx fleet average standard and support the elimination of the Cleaner Car provision. We do specifically request bin alignment with EPA to avoid additional complexity in the certification process and fleet compliance analysis.

## **Greenhouse Gas Standards**

We appreciate CARB sharing their thoughts on what is under consideration for this rule. However, Hyundai supports delaying the amendments for the greenhouse gas standards to a later date. The current proposal contains many complexities around footprint curve design, PHEV treatment, standard levels, and the effective start date of the new rule. Additional time will allow stakeholders to thoroughly evaluate and share feedback for CARB's consideration.

## **ZEV Assurance**

### CA Environmental Performance Label

Hyundai aligns with Auto Innovators' and HATCI's comments. While we agree that more relevant information specifically for electric vehicles ("EV") should be on a vehicle label, we strongly support a single customer-facing vehicle label in conjunction with EPA. The Mobile Sources Technical Review Subcommittee ("MSTRS"), a subcommittee to the Clean Air Act Advisory Committee, has created an EV Testing/Labeling working group for the purpose of developing a new customer-facing vehicle label. Members of this working group include automakers and other stakeholders as well as CARB and EPA. For efficiency purposes, we request that CARB wait until MSTRS completes its work and, in coordination with EPA, develop a new comprehensive customer-facing vehicle label.

### Charging Interoperability

As stated in our comment letter for the ACC II Amendments Kick-off Workshop, dated January 12, 2024, Hyundai understands the interoperability issues and aligns with Auto Innovators' and HATCI's comments. See Attachment B.

## **Combined Charging System (CCS) Adapter**

Consistent with our comment letter for the ACC II Amendments Kick-off Workshop, dated January 12, 2014, we continue to strongly request that CARB amend the ACC II rules as soon as possible to remove the CCS adapter requirement starting model year 2026. See Attachment B.

## **Closing**

We appreciate CARB taking the time to hold a workshop to discuss potential ACC II amendments

and we look forward to continuing this discussion over the coming year.

Sincerely,



Gilbert Castillo  
Director, Regulatory Compliance  
Hyundai Motor North America

Enclosures: Attachment A: HATCI Comments to CARB's ACC II Amendments Workshop dated July 26, 2024

Attachment B: HMA Comments to ACC II Amendments Kick-off Workshop dated January 12, 2024

# ATTACHMENT A



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Ms. Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Randolph,

Hyundai America Technical Center, Inc. (HATCI) appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Cars II (ACC II) regulations discussed during the California Air Resources Board's (CARB) June 26, 2024 workshop. HATCI is the U.S.-based research and development (R&D) branch for both Hyundai Motor Company (HMC) and KIA Corporation (Kia), and together with HATCI, are collectively referred to as Hyundai Motor Group (HMG). HATCI is commenting on behalf of both HMC and Kia. Additionally, HATCI supports the comments submitted by the Alliance for Automotive Innovation (AFAI) regarding the ACC II amendments.

HMG agrees with CARB's decision to review the U.S. Environmental Protection Agency (EPA) Multi-Pollutant Emission Standards for Model Years 2027 and Later for Light-Duty and Medium-Duty Vehicles final rule before proceeding on proposed amendments to ACC II's Greenhouse Gas (GHG) and Low-Emission Vehicle IV (LEV IV) criteria standards. HMG appreciates where alignment with the EPA final rule is being proposed and looks forward to more engagement in the amendment process.

### **Light-Duty GHG standards**

As presented in the June 26 workshop, CARB is proposing an Internal Combustion Engine (ICE)-only GHG fleet average standard beginning in model year (MY) 2030. HMG understands CARB's desire to update the GHG standard and requests CARB to create consistency and align with the EPA GHG standards in the forthcoming MY 2027 multipollutant rule, including electric vehicles (EV)s. Harmonizing CARB's GHG standards with those set by the EPA is critical to streamlining regulatory compliance.

CARB presented a slide during the workshop titled "Technologies available today can further reduce emissions from Light-Duty ICEVs", including lightweighting, Advanced Engine Technologies and Hybridization. HMG has incorporated all these technologies into our product plans, including expanding hybrid options in both the Hyundai and Kia vehicle line-ups, increasing the quantity of Hybrid Electric



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Vehicles (HEVs) in MY 2026 and beyond. By investing in these technologies, HMG is able to both lower the environmental impact of our vehicles and meet ongoing regulatory requirements to reduce emissions.

### **Off-Cycle Credits**

HMG appreciates CARB's proposal to phase out Off-Cycle credits in alignment with the EPA multipollutant final rule. This is an important move towards ensuring consistent and effective emission reductions across the industry. In additional support of this alignment, we suggest CARB consider adopting a phase out schedule similar to EPA's timeline. We request that CARB eliminate the minimum sales percentage requirement associated with the off-cycle credits in 13 CCR § 1961.3 (a)(8)(A). Harmonizing the phase-out schedule and eliminating the minimum sales percentage requirement will streamline this transition, allowing HMG to allocate resources towards solutions that reduce emissions without the added complexity of managing sales targets.

### **Air Conditioning (AC) Refrigerant Leakage Credits**

HMG is in agreement with CARB that leakage credits should continue to be included in the ACC II regulations. HMG believes this credit will continue to be an essential incentive for the automotive industry to ensure anti-leakage designs in vehicles. HMG does not support the proposal for a ZEV specific leakage standard or design requirement. HMG fully transitioned to HFO-1234yF in MY 2021, and with the finalization of the American Innovation and Manufacturing (AIM) Act, expect the rest of industry to be compliant with low-GWP refrigerants soon. While we understand the intent, we believe a specific standard poses unnecessary burden that would impact manufacturers and consumers with increased costs and product development delays, with minimal environmental benefit.

### **Light-Duty Criteria Standards**

HMG appreciates CARB's decision to maintain the NMOG + NOX fleet average standard in the regulations. This decision supports continuity and stability needed for industry to focus resources towards advancing technologies that reduce emissions while still meeting requirements set forth by CARB.

### **Bins**

As noted in our comments submitted for the November 2023 workshop, for consistency and to reduce test burden, HMG believes it is appropriate for CARB to align certification bins with the EPA. While we continue to advocate for full alignment of certification bins with the EPA rule, we recognize and appreciate the proposal to eliminate the Cleaner Car provision. This action will provide greater flexibility in meeting emission standards for certification.

### **Particulate Matter**

CARB is proposing to lower the particulate matter (PM) standard to 0.5 mg/mi for the FTP and US06 test cycles, consistent with the EPA Tier 4 standards in the multipollutant rule. HMG's R&D is incorporating significant design changes, which include the addition of a gasoline particulate filter (GPF) for several models to meet this target for the ACC II regulations. While the implementation of this PM standard



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presents many challenges, HMG recognizes CARB's decision to harmonize with the EPA Tier 4 standards for consistency and supports aligning with the EPA multipollutant final rule in MY 2030.

#### **Evaporative Emissions: Non-Integrated Refueling Canister Only System (NIRCOS)**

HMG appreciates the proposal to extend preconditioning procedure to all vehicle types. HMG has advocated for this update and has plans to apply NIRCOS to all our HEVs, beginning with the MY 2026 Hyundai Palisade (LX3) HEV. The adoption of these procedures demonstrates HMG's commitment to leading in advanced emission control technologies.

#### **High Altitude Emission Standards**

HMG believes there are significant challenges associated with CARB requiring increased high altitude emission standards. There are currently a limited number of facilities capable of conducting high altitude emission testing, which are in high demand by multiple manufacturers. High altitude emission standards would also require costly vehicle system redesigns, resulting in higher vehicle costs for consumers. For all these reasons, HMG supports AFAC's position, recommending alignment with the EPA Tier 4 standards, eliminating high altitude standards for US06, SC03 and 50F. HMG is in the process of conducting high altitude testing, and welcomes discussion with CARB on this topic in the future.

#### **ZEV Assurance Measures**

##### **Environmental Performance Label (EPL)**

HMG recognizes CARB's concern that the EPA/DOT Fuel Economy label currently does not contain information that is informative for zero emission vehicles (ZEVs). HMG strongly urges CARB to coordinate with the EPA on creating a single, unified label for all vehicles. The presence of multiple labels with similar but slightly different metrics could overwhelm and cause confusion for consumers. A single label that includes consistent, accurate and credible information on both fuel economy and ZEV metrics simplifies the decision-making process to better serve consumers. HMG supports the work of the Mobile Source Technical Review Subcommittee (MSTRS) in creating a work group to gather useful and updated information on ZEVs for the Monroney label.

##### **Charging Interoperability**

Beginning in MY 2028, CARB is proposing battery electric vehicles (BEVs) and fast charge plug-in hybrid vehicles (PHEVs) require the implementation of DIN SPEC 70121 and ISO 15118-2. HMG looks forward to further detailed guidance on which specific features of DIN SPEC 70121 and ISO 15118-2 will be implemented in the timeline, and associated conformance testing.

##### **Battery Labeling – 1962.6**

HMG appreciates CARB's engagement with the automotive industry on battery labeling and certification concerns in the ACC II 1962.6 regulations and looks forward to receiving formal guidance on the topics discussed to have adequate time to implement the requirements.



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### **North American Charging Standard (NACS)/ SAE J3400**

To reiterate our submitted comments to the November 2023 workshop, HMG urges CARB to include NACS (J3400) as an option to meet compliance with ACC II's charging requirements. With the finalization of J3400 expected soon, HMG believes it is timely and beneficial for CARB to eliminate the requirement to supply an adapter for EVs equipped with either an SAE J3400 or an SAE J1772 port.

### **Conclusion**

HMG thanks CARB for the opportunity to comment and be involved in ongoing dialogue in this regulation process. HMG is committed to working with CARB to address the complexities and challenges in meeting the proposed standards, while also working towards our shared electrification goals.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Willard".

Richard Willard  
Director, Regulation & Certification  
Hyundai America Technical Center, Inc.



# ATTACHMENT B

January 12, 2024

Via Email: [cleancars@arb.ca.gov](mailto:cleancars@arb.ca.gov)

Via Docket: <https://ww2.arb.ca.gov/public-comments/comment-log-advanced-clean-cars-ii-amendments-november-workshop>

Ms. Liane Randolph, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Hyundai's Comments to the California Air Resources Board's Advanced Clean Cars II Amendments Kick-off Workshop

Dear Chair Randolph:

Hyundai Motor America ("Hyundai") appreciates the opportunity to comment on the California Air Resources Board's ("CARB") Advanced Clean Cars II ("ACC II") Amendments Kick-off Workshop held on November 15, 2023.

Hyundai's north star of Progress for Humanity pushes us to evolve from a car company to smart mobility provider that moves goods and people more efficiently and by electrification. Accordingly, we offer a full suite of clean powertrain vehicles including hybrid electric vehicles ("HEVs"), plug-in hybrid electric vehicles ("PHEVs"), battery electric vehicles ("BEVs"), and hydrogen fuel cell electric vehicles ("FCEVs") in addition to our internal combustion engine ("ICE") vehicles. Hyundai Motor Group ("HMG") will launch its first fully dedicated electrical vehicle ("EV") and battery manufacturing facilities this year.<sup>1</sup> Next year, HMG and SK On will also open a joint EV Battery Cell manufacturing plant to complement our battery manufacturing capabilities.<sup>2</sup> These investments are part of a broader effort in achieving Hyundai's global carbon-neutrality goal by 2050.

Regarding ACC II's proposed amendments, Hyundai is all in on the clean cars transition. However, there are many pieces to the puzzle that must coalesce for Hyundai and CARB to meet these ambitious goals. Mass consumer adoption, electric grid resiliency, expanded volume and improved reliability charging and hydrogen stations, and complementary policies are necessary for ACC II's success. As a partner committed to doing our part to ensure ACC II's success, this letter provides our initial feedback to the Workshop.

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<sup>1</sup> ["Hyundai Motor Group to Establish First Dedicated EV Plant and Battery Manufacturing Facility in the U.S."](#), Hyundai Press release, May 20, 2022.

<sup>2</sup> [Hyundai Motor Group and SK On to Establish EV Battery Cell Production Joint Venture in US](#). Hyundai Motor Group, Press release, 4/25/23.

## Greenhouse Gas Standards

We are most concerned about redirecting resources away from electrification and back to ICE vehicles because of its impact to slow the transition to ZEVs and/or make it more costly. Our full attention toward ZEVs over the next decade is critical to delivering ACC II's success. Moreover, the ZEV rule is itself a backstop for LEV and GHG programs. Therefore, we believe backsliding concerns are minimal if not misplaced. In summary, we support our industry association, the Association for Automotive Innovation ("AFAI") comments that call for a national GHG regulation without a state counterpart. If, however, California pursues a GHG rule, we prefer alignment with the forthcoming federal GHG rule, specifically to be consistent regarding the inclusion of ZEVs in such rule.

## ZEV Assurance Measures

### Interoperability

HMA understands the interoperability issues as it effects our customers every day. We are working closely with AFAI on this important topic and hope to share more information with CARB in the coming months.

### New Environmental Performance label

We understand CARB's concern that customers may be confused about EV range under certain driving conditions (e.g., cold temperatures) and real-world charging times based on the charging station types (Level 1, Level 2, direct current fast charging). However, we strongly advise caution on the requirement of a new label with new information that could cause additional customer confusion when compared to the existing EPA and NHTSA labeling information. We agree with AFAI's comments on this topic.

## Environmental Justice

Hyundai applauds California for its leadership and commitment to Priority Communities through its ZEV Equity programs. We believe these programs represent important policy; robust and meaningful engagement by industry is important to reach these populations and deliver program success. To further support such success, we are enclosing **Attachment 1**, a concept called the Community Energy Savings Credit, for your consideration as part of the ACC II Amendments. We submitted a similar concept to the NHTSA<sup>3</sup> and EPA<sup>4</sup> rulemaking dockets. The concept draws on ACC II's Community-based Clean Mobility Program's MSRP discount structure. However, here the discount is provided on ZEVs sold to income-qualified *individuals* – rather than community organizations. Income qualifications should be set by regulation, allowing for annual Consumer Price Index ("CPI")-related adjustments. To further qualify, an individual must show proof that they scrapped their ICE vehicle (aged at least ten model years). The selling automaker then would earn

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<sup>3</sup> [88 Fed. Reg. 56,128 \(Aug. 17, 2023\)](#)

<sup>4</sup> [88 Fed. Reg. 29,184 \(May 5, 2023\)](#)

additional ZEVs credits for each ZEV sold through this channel. Our proposal includes reporting as well as auditing requirements.

Relatedly, we encourage CARB to consider reducing ZEV Equity program participation barriers. Most importantly, we believe increasing the amount of ZEV credits earned, and reducing (or removing) the program credit cap, will better engage industry. Additional incremental credit values recognize the significant resources the OEM is dedicating to operationalize these programs within their organizations. Removal of the current 10% cap is appropriate because there is a natural sales threshold due to each program's requirements. Eliminating these barriers will encourage greater OEM participation and therefore greater EV penetration to Priority Communities. These programs serve as the latest example of California's trailblazing history and we believe can be the cornerstone to important and overdue policies at the federal level. Hyundai is happy to meet to further discuss these ideas.

### **Combined Charging System (CCS) Adapter**

Since May 2023, approximately 95% of the EV market has indicated a transition to the North American Charging Standard (NACS). This includes Hyundai and Genesis vehicles. Both brands announced a commitment to switching to NACS starting MY 2025. NACS is also being standardized by the Society of Automotive Engineers (SAE) as J3400. The standardization process was launched in July 2023 and the final standard is expected in June 2024. In light of these recent activities, we strongly request that CARB amend the ACC II rules to remove the CCS adapter requirement for MY 2026.

### **Closing**

In closing, Hyundai fully endorses the comments submitted separately by AFAl and by Hyundai America Technical Center, Inc. ("HATCI"). Please see **Attachment 2**.

We appreciate CARB taking the time to hold a workshop to discuss potential ACC II amendments and we look forward to continuing this discussion over the coming year.

Sincerely,



Gilbert Castillo  
Director, Regulatory Compliance  
Hyundai Motor North America

Enclosures:      Attachment 1: Hyundai's "Community Energy Savings Credit" concept  
                         Attachment 2: HATCI Comments to CARB's ACC II Amendments Workshop

## ATTACHMENT 1

# Overview: Community Energy Savings Credit

The following represents a general program design for NHTSA's consideration.

- Concept Design: 25% MSRP Discount to eligible Low-Income Individuals
- Eligible Consumers: Income less than or equal to 2x the Federal Poverty Level\*
  - Regulation to specify required income verification documents (ex: Tax Return)
- Eligible Vehicles:
  - Scrapped vehicle: ICE vehicles, 10 model years or older
  - Purchase/Lease: New PHEVs, BEVs, FCEVs
- Reporting: Annual OEM report will include applicable vehicle sales volume and certification of income, applied MSRP discount, and evidence of vehicle scrappage (personal identifying information will not be disclosed)
  - Option to require OEMs to calculate fuel savings of the scrapped versus new vehicle
- Audit: OEM and scrappage companies subject to agency audit
- Credit Earnings: Significant OEM costs and resource investments to facilitate this optional program warrant appropriate credit values. This is necessary to encourage automakers to utilize the program to promote ZEV access and affordability for low-income populations.
  - PHEVs: 1 additional credit earned
  - BEVs and FCEVs: 2 additional credits earned

\*[EJScreen](#) Definition of "Low Income"

## ATTACHMENT 2

January 11, 2024

Via Email: [cleancars@arb.ca.gov](mailto:cleancars@arb.ca.gov)

Via docket: <https://ww2.arb.ca.gov/public-comments/comment-log-advanced-clean-cars-ii-amendments-november-workshop>

Ms. Liane Randolph, Chair  
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1001 I Street  
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Dear Chair Randolph,

Hyundai America Technical Center, Inc. (HATCI) appreciates the opportunity to provide comments on the proposed amendments to the Advanced Clean Cars II (ACC II) regulations discussed during the California Air Resources Board's (CARB) November 15, 2023 workshop (Workshop). HATCI is the U.S.-based research and development (R&D) branch for both Hyundai Motor Company (HMC) and KIA Corporation (Kia), and together with HATCI, are collectively referred to as Hyundai Motor Group (HMG). HATCI is commenting on behalf of both HMC and Kia. Additionally, HATCI supports the comments submitted by the Alliance for Automotive Innovation (AFAI) regarding the ACC II amendments.

As described during the Workshop, HMG agrees with CARB's decision to wait until the U.S. Environmental Protection Agency (EPA) Multi-Pollutant Emission Standards for Model Years 2027 and Later for Light-Duty and Medium-Duty Vehicles final rule (Multi-Pollutant Rule) is issued before deciding on proposed amendments to ACC II's Green House Gas (GHG) and Low-Emission Vehicle IV (LEV IV) criteria standards.

**I. GHG standards**

HMG continues to make strong investments in our electrified vehicle fleet and is committed to working toward California's climate target for carbon neutrality by 2045. HMG understands CARB's desire to establish a California GHG program and ensure continued movement towards California's climate goals.

CARB noted its concern in the Workshop that the federal GHG standards alone do not prevent backsliding and requested input on anti-backsliding mechanisms. HMG is committed to moving forward with zero emission vehicles which will soon remove all risk of GHG backsliding. HMG does not believe potential backsliding mechanisms are necessary in the ACC II regulations given HMG's strong commitments to electrification, including its goal for every HMG vehicle to be fully electrified by 2040 and some brands being fully electric by 2030.

Additionally, HMG does not support the direct adoption of EPA's GHG standards for the ACC II regulations. The stringency of the EPA standards are based on the inclusion of ZEVs. It would be very difficult to meet the same standards with ICE only emission performance.



HMG continues to support the restoration of the deemed-to-comply option. This option would significantly reduce the reporting burden experienced by manufacturers with two separate GHG standards.

HMG agrees with CARB that leakage credits should continue to be included in the ACC II regulations. HMG believes the credits will continue to be an essential incentive for the automotive industry to ensure anti-leakage designs in vehicles. HMG is an early adopter and already fully compliant with the refrigerant rule in the American Innovation and Manufacturing Act. HMG appreciates the direct leakage credits to reward early compliance but does not support additional regulations for low leak A/C systems. In addition to fully transitioning to HFO-1234yf in model year 2021, HMG also applied a seal washer to our system to further prevent leakage. HMG made these large investments with the expectation that earned credits would offset some of these costs in the future. HMG recommends that CARB does not align with EPA on the immediate elimination of leakage credits, but instead proposes a gradual phase-down which will continue to encourage manufacturers to use low-leak systems.

HMG also supports the continuation of A/C efficiency credits and off-cycle credits for BEVs, as those credits encourage the development of GHG reducing technologies and provide real world benefits.

## **II. Criteria Standards/ LEV IV**

HMG appreciates CARB waiting for the evaluation of the Multi-Pollutant Rule to consider changes to the criteria pollutant standards. HMG looks forward to further discussion on where alignment is appropriate after reviewing the final Multi-Pollutant Rule once issued.

For consistency and reducing test burden, HMG believes it is appropriate for CARB to align certification bins with the EPA.

HMG is opposed to aligning with EPA's proposed particulate matter (PM) standard of 0.5 mg/mi in the Multi-Pollutant Rule. HMG has expressed concern with the EPA related to measurement inaccuracy in testing at this extremely low level of PM. HMG's R&D is preparing for CARB's current PM target of 1.0 mg/mi and urges CARB to maintain the current PM standard in the ACC II regulation. CARB's current target of 1.0 mg/mi is already difficult and will require significant design changes, which include adding a gasoline particulate filter (GPF) for several models. At this time, HMG does not believe a 0.5 mg/ mi standard to be reasonable or technically feasible.

## **III. North American Charging Standard ( NACS)**

HMG, with many other automakers, are quickly moving towards the North American Charging Standard (NACS) (SAE J3400, expected to be finalized around the middle of 2024). HMG strongly urges CARB to include NACS as an option to meet compliance with ACC II's charging requirements. HMG also requests that CARB eliminate the requirement for the Combined Charging System (CCS) adapter from the ACC II regulations for model year 2026. This is a time sensitive issue, as product planning is already underway for how to source and package these adapters. A final decision in summer 2025 based on CARB's current timeline for the ACCII amendments would be too late for vehicles already certified for model year 2026.

**IV. ZEV Assurance Measures - Environmental Performance (EP) Label**

HMG recognizes CARB's desire to include more detailed and valuable information for potential EV consumers on the EP label. HMG strives for consumers to have clear information when making a decision to purchase an electric vehicle but urges CARB to consider the excessive burden to the manufacturer compared to the value the information brings to the consumer. HMG urges CARB to coordinate with federal agencies and align with the EPA/DOT fuel economy label. This would avoid duplicative, conflicting, and confusing labels for consumers.

If alignment is not possible, HMG suggests that CARB create metrics that can be derived from an equation for the new label rather than submitting the data from actual testing. Another option for consideration is to modify current test procedures to generate additional data rather than adding new tests. Both options could support additional label information while avoiding increased test burden.

**V. Conclusion**

HMG thanks CARB for the opportunity to comment and looks forward to engagement with CARB on the proposed amendments to the ACC II regulation.

Sincerely,



Richard Willard

Director, Certification and Regulation

Hyundai America Technical Center, Inc.