



**ZERO EMISSION  
TRANSPORTATION  
ASSOCIATION**

July 26, 2024

Ms. Liane M. Randolph  
Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95812

**RE: Advanced Clean Cars II Amendments - June 2024 Workshop**  
*Submitted via online comment portal.*

The Zero Emission Transportation Association (ZETA) is an industry-backed coalition of over 50 member companies advocating for 100% electric vehicle (EV) sales. ZETA is committed to enacting policies that drive EV adoption, create hundreds of thousands of jobs, dramatically improve public health, and significantly reduce emissions. Our coalition spans the entire EV supply chain including vehicle manufacturers, charging infrastructure manufacturers and network operators, battery manufacturers and recyclers, electricity providers, and critical minerals producers, among others.

We thank the California Air Resources Board (CARB) for the opportunity to comment on its proposed amendments to the Advanced Clean Cars II (ACC II) program as presented at its June 26, 2024 workshop. Transportation remains the leading source of domestic greenhouse gas emissions<sup>1</sup> and the ACC II program is key to state leadership in reducing emissions from the transportation sector. Doing so will provide cleaner and healthier air for California residents and residents of states across the country while creating hundreds of thousands of domestic jobs throughout the EV supply chain. ZETA appreciates CARB's efforts to align the ACC II program with the U.S. Environmental Protection Agency's (USEPA) recent light- and medium-duty multi-pollutant tailpipe emissions standards,<sup>2</sup> where appropriate. We make a handful of recommendations below that we believe will further strengthen the program while better reflecting current and future EV trends.

## **Light-Duty Greenhouse Gas Standards**

### ZETA Supports the Phaseout of Off-Cycle Credits

While off-cycle credits are a useful policy tool to promote marginal improvements in vehicle efficiency, the urgency in needing to reduce tailpipe emissions - coupled with the high implementation costs noted by CARB - warrants phasing out the program. ZETA encourages CARB to finalize an off-cycle credit phaseout schedule that is faster than the one adopted by the

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<sup>1</sup> "Fast Facts on Transportation Greenhouse Gas Emissions," U.S. EPA, June 18, 2024.  
<https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>

<sup>2</sup> 89 Fed. Reg. 27842 (April 18, 2024)

USEPA in its recently finalized light- and medium-duty multi-pollutant tailpipe emissions standards in order to reduce administrative costs and cut emissions as soon as practicable.

### ZETA Supports CARB's Adoption of USEPA's Revised Medium-Duty Passenger Vehicle Definition

CARB's alignment with the USEPA on the definition of medium-duty passenger vehicles (MDPVs) ensures regulatory consistency between ACC II and federal programs while also anticipating changes to the MDPV fleet. As MDPVs become increasingly electrified, regulations should adjust to accommodate the increased weight associated with the onboard battery. MDPVs are predominantly used to transport people, rather than goods, and therefore should be subject to standards whose stringency is consistent with non-work-based applications.

### **ZEV Assurance Measures**

### ZETA Encourages CARB to Continue Partnering with USEPA as it Considers Updates to Consumer-Facing Vehicle Labels

ZETA appreciates CARB's proposed updates to the California Environmental Performance Label to include charge rates of EVs, which will provide useful metrics to consumers and help them make informed purchasing decisions. CARB's approach to the updates, focused on extensive public surveying, is a thoughtful way to measure current labels' usefulness and ensure new requirements add value for consumers. We encourage CARB to continue its collaboration with USEPA in developing updates to the performance labels in order to align state and federal updates and ensure harmonization across jurisdictions.

### ZETA Comments on Proposed Charging Interoperability Requirements

ZETA supports CARB's efforts to increase interoperability between EVs and electric vehicle supply equipment (EVSE), helping to create a more consistent charging experience for users and thereby encouraging greater EV adoption. While more work remains necessary to ensure seamless communication between EVs and EVSE, the proposal for interoperability requirements to begin in MY 2028 will provide industry with adequate lead time to ensure that conformance testing requirements are scoped appropriately and scalable. To ensure that the potential of ISO 15118-2 is fully realized, CARB should look to industry vetted conformance tests for certification, including CharIN CCS Extended.

ZETA recommends that CARB provide specificity around which use cases to focus on in ISO 15118-2 testing as well as how it envisions the interoperability conformance testing process will fit into the existing process automakers must fulfill to sell vehicles in California. By providing clear, comprehensive parameters for conformance testing, CARB can ensure consistent implementation of the ISO standard across manufacturers. We encourage CARB to continue

working with the EV and EVSE industries to develop ISO 15118-2 conformance testing and balance compliance burden with the importance of conformance to standards.

### **Additional Recommendations for CARB Consideration**

#### CARB Should Make the ZEV Convenience Cord Requirements Optional Based on Consumer Preference

ZETA requests that CARB use its amendment period to review convenience cord requirements for MY 2026 and beyond, as outlined in 13 CCR § 1962.3(c)(3). While ZETA appreciates the intent of the convenience cord in providing access to the benefits of Level 2 home charging for all drivers, we encourage CARB to consider instead requiring that they be made available as optional add-ons in the purchasing or leasing process. Consumers have the best understanding of their own charging needs and will be able to decide whether or not the cord will be necessary in their day-to-day use.

#### CARB Should Consider Updating Vehicle Inlet and Adapter Requirements to Ensure Program Future-Proofing

Since ACC II was finalized in November 2022, EV charging standards have coalesced around NACS/J3400. Moving forward, every major U.S. EV manufacturer will include J3400 in their vehicles by or before MY 2026, the year that ACC II regulations take effect.<sup>3,4</sup> This comes at the same time as the Society of Automotive Engineers is working to create consensus standards for SAE J3400, with final standards expected well before MY 2026. Current ACC II regulations, however, do not reflect this, requiring the CCS/J1772 standard by default and allowing other charging ports only if manufacturers include adaptors with the vehicle.<sup>5</sup> ZETA recommends that CARB formally include J3400 as an option under the ACC II program in order to reflect the incoming charging standard as well as make adapters optional add-ons customers can select based on their preferences.

As the industry moves towards a unified charging standard, adapters will be useful for customers and enable access to existing CCS chargers and for legacy vehicles. However, we are concerned by the potential proliferation of unsafe adapters from third-party retailers. We encourage CARB to work with industry and stakeholders to ensure adapters are safe for drivers.

For more discussion on the industry transition to NACS/J3400 connectors, please see ZETA's comments to the U.S. Federal Highway Administration from April 2024.<sup>6</sup>

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<sup>3</sup> "Stellantis becomes the last major automaker to adopt Tesla's charging plug," The Verge, February 12 2024. <https://www.theverge.com/2024/2/12/24070654/stellantis-tesla-ev-charging-plus-nacs-adapter>

<sup>4</sup> "Tesla Charging Network: All the Upcoming Compatible EVs." Car and Driver, January 16 2024. <https://www.caranddriver.com/news/a44388939/tesla-nacs-charging-network-compatibility/>

<sup>5</sup> 13 CCR § 1962.3

<sup>6</sup> <https://www.regulations.gov/comment/FHWA-2023-0054-0109>

## **Conclusion**

ZETA thanks the California Air Resources Board for the opportunity to provide comments on its proposed ACC II amendments. We appreciate CARB's work to amend the program in ways that acknowledge recent technological development trends in the EV industry and reduce compliance costs while maintaining robust safety and reliability standards.

ZETA and its member companies appreciate your attention to these comments and are available should you have any additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'AG', written in a cursive style.

Albert Gore  
Executive Director  
Zero Emission Transportation Association