

July 26, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814

RE: Comments in Response to Advanced Clean Cars II Amendments – June Workshop

Dear California Air Resources Board Staff,

On behalf of the undersigned organizations, we are following up on our previous letter dated January 15, 2024¹ requesting CARB amend the current Advanced Clean Cars II (ACC) II requirements to reflect the industry adoption of the North American Charging Standard (NACS) connector. Aligning ACC II with this fundamental shift is the most efficient and cost-effective path forward.

As it amends the ACC II regulations, CARB should ensure that the requirements under Section 1962.3 are consistent with current market trends and support the rapidly evolving EV charging landscape. During the June 26, 2024 workshop, CARB staff did not propose any specific modifications for incorporating J3400 NACS under the ACC II amendments process. However, during the Q&A CARB staff noted that it was evaluating this item and is eager to receive industry input.

It has been six months since this group of leading electric vehicle manufacturers provided an initial recommendation on how to amend ACC II to reflect the adoption of J3400 NACS. Since then, the Society of Automotive Engineers (SAE) has continued to push forward with its standardization work by releasing the first draft of the recommended practice for J3400, which is expected to be finalized and published in Q3 2024. The recommended practice builds off the technical information report (TIR) released in December 2023² and lays the foundation for a robust final standard expected in Q4 2024. While standardization can take time given the many entities involved and the significant interest in J3400, this process will be complete well before the implementation of ACCII in MY 2026.

With J3400 standardization well underway and the auto industry moving toward universal adoption, CARB must act with urgency to amend the now obsolete requirement that all vehicles manufactured on or after MY 2026 to be equipped with a

¹ Joint Industry Letter J3400, January 15, 2024. Available at: <https://ww2.arb.ca.gov/form/public-comments/submissions/7901>

² <https://www.sae.org/news/2023/12/sae-j3400-tir-released>

CCS Direct Current (DC) inlet or to provide a CCS adapter.³ If the current requirement is upheld, 99% of the EV market would be required to supply a CCS adapter, adding additional and unnecessary cost to the vehicle, even for drivers who may not want or need an adapter. It is clear this requirement is contrary to current market trends and could lead to stranded assets for industry and increased costs for outdated equipment for consumers.

Thank you for the opportunity to provide an update regarding SAE J3400 NACS and the urgency for amending the ACC II regulations.

Sincerely,

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³ Title 13, California Code of Regulations, § 1962.3.

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