



July 26, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814

Submitted via ACC docket and email to cleancars@arb.ca.gov

Re: CalETC Comment on Advanced Clean Cars Workshop June 26, 2024

Dear CARB Staff:

The California Electric Transportation Coalition (CalETC) appreciates the opportunity to provide our feedback on the concepts presented during the June 26, 2024 Advanced Clean Cars II (ACC II) Workshop.

CalETC supports and advocates for the transition to a zero-emission transportation future to spur economic growth, fuel diversity and energy independence, contribute to clean air, and combat climate change. CalETC is a non-profit association committed to the successful introduction and large-scale deployment of all forms of electric transportation. Our Board of Directors includes representatives from: Los Angeles Department of Water and Power, Pacific Gas and Electric, Sacramento Municipal Utility District, San Diego Gas and Electric, Southern California Edison, Southern California Public Power Authority, and the Northern California Power Agency. In addition to electric utilities, our membership includes major automakers, manufacturers of zero-emission trucks and buses, electric vehicle charging providers, autonomous electric vehicle fleet operators, and other industry leaders supporting transportation electrification.

CalETC appreciates the opportunity to comment on the aspects of the rulemaking related to Zero-emission Vehicles (ZEV), including potential revisions to requirements for consumer-facing vehicle labels and CARB staff's charging interoperability proposal. Furthermore, while we understand that CARB is not currently considering amendments to the ZEV stringency provisions, we want to reiterate our long-standing support for Plug-In Hybrid Electric Vehicle (PHEV) technologies. For many customers, especially those without access to home charging, PHEVs are a convenient way for them to transition to an electric vehicle without range anxiety and many PHEV models provide enough all-electric range for customers to power most of their driving needs¹. We agree with staff that more data and analysis is needed to accurately count the benefits of PHEVs and we recommend that CARB conduct such analysis, or join with the OEMs, US EPA, US Department of Energy and the National Laboratories to revise the Fleet Utility Factor that is defined in SAE J2841.

¹ See 40 CFR Parts 85, 86, 600, 1036, 1037, 1066, and 1068 at Figures 11 and 12.
<https://www.govinfo.gov/content/pkg/FR-2024-04-18/pdf/2024-06214.pdf>

With regard to the consumer-facing label, and as previously noted in our January 15, 2024 comments, CalETC strongly recommends that CARB establish a working group that includes regulators from US EPA to ensure that any new label requirements can be implemented on all vehicles across the United States, to avoid duplicative or conflicting information which would cause customer confusion. We also support labeling requirements that utilize existing tests conducted by OEMs. The goal is to educate customers on how to think about and plan for their electric vehicle needs and compare performance during charging and in use, and we believe that can be done without adding test burden. To that end, for determination of range, we support utilizing SAE J1634 testing standard which contains city driving range, highway driving range, and battery depletion steady state at 65 mph². Lastly, we do not recommend that CARB require identification of the range to the tenth of a mile, as electric vehicle range is variable depending on use cases. Such specificity has the potential to confuse drivers and give them a false sense of surety if they are not accustomed to driving an EV. Instead, we support including the driving mileage within a range of 5-10 miles.

Regarding the charging interoperability proposal, CalETC strongly recommends that if CARB decides to adopt standards, standards should be enforceable no earlier than beginning with model year 2028. All automakers currently self-certify existing standards, which is industry practice for many regulatory standards, including emissions standards. Self-certification is the most efficient way for automakers to certify conformance with these standards and will avoid increasing costs or delaying vehicle availability. CalETC also supports utilization of DIN SPEC 70121 and ISO 15118-2.

Virtually every manufacturer has announced a plan to transition from the SAE J1772(CCS1) to the SAE J3400 port. Once SAE J3400 is published, we recommend CARB revise 13 CCR § 1962.3 to allow either CCS1 or J3400 charger inlet without requiring adapters. Requiring adapters will add costs and likely delay the industry consolidation to SAE J3400.

To the extent adapter provisions remain in ACC II, CalETC also supports continued exploration of standards that promote adapter safety and performance. CalETC encourages CARB to closely monitor UL's progress in developing these standards and to consider requiring UL 2252 certified adapters and/or adapters certified, approved, released, endorsed or provided by the OEM of a customer's vehicle for all adapters provided under ACC II regulations. Provision of reliable adapters helps ensure EV drivers of NACS-capable EVs will still be able to access the thousands of CCS fast chargers across California that the EV charging industry and the State have invested in to spur EV adoption.

² See https://www.sae.org/standards/content/j1634_202104/

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Thank you for your consideration of our comments. Please do not hesitate to contact me if you have any questions at laura@caletc.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Renger', with a long horizontal flourish extending to the right.

Laura Renger

Executive Director

California Electric Transportation Coalition