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Submitted via CARB Comment Log for Drive Forward Light-duty Vehicle Program

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Scout Motors Inc. Comments on CARB Drive Forward Light Duty Vehicle Program: Second Public Workshop

Scout Motors Inc. ("Scout Motors") appreciates the opportunity to comment on the California Air Resources Board's ("CARB") Drive Forward Light-Duty Vehicle Program solicitation following its second public workshop on June 22, 2026. Scout Motors was established in 2022 as an independent American startup to revitalize the iconic Scout vehicle brand through the introduction of all-new, electrified, off-road capable light-duty trucks and sport utility vehicles ("SUV"). Scout Motors will produce both full battery electric vehicle ("BEV") as well as extended-range electric vehicle ("EREV") variants for each of its Scout® Traveler™ (SUV) and Terra™ (pickup truck) models. As requested during CARB's second public workshop, Scout Motors is providing comments on select policy proposals related to BEV window sticker requirements and vehicle charging high-level communication standards. Scout Motors also reiterates its position, as relayed in prior comments, that future CARB regulations should recognize and incentivize technologies, like EREV, that provide all-electric driving ranges approaching that of current BEV powertrains.

Proposed Window Sticker Requirement Modifications

Scout Motors welcomes and strongly supports CARB's proposed BEV window sticker and encourages CARB to develop an EREV and/or plug-in hybrid electric vehicle ("PHEV") window sticker with similar electric driving information at the same time BEV window sticker requirements are put in place. Doing so will ensure that potential EREV and PHEV consumers are able to clearly discern the electric driving capabilities of all electrified vehicle options when making a new purchase.

As displayed in the Attachment, Scout Motors is offering proposed modifications for consumer clarity, including: adding vehicle year/make/model/trim; explanation of typical L1/L2 charging outlets; consolidating city and highway ranges; clarifying that temperature-rated ranges are for combined driving; adding color-coding to temperature-rated ranges; supplementing symbols with helper text in the charging speed box (e.g., "+24 miles in 1 hour"); identifying state-of-charge ranges for fastest charging; identifying the vehicle's max charging power in kW; identifying if the vehicle is factory-equipped with bi-directional charging functionality.

Scout Motors further proposes a new section for electric driving efficiency and costs, to include: estimated cost to drive 100 miles (using nationwide or California-based average $/kWh, combined driving); overall vehicle efficiency (kWh/100mi, combined driving) and an associated scale to compare to similar electric vehicles; QR code link to a CARB website capable of showing

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personalized driving cost estimates per 100 miles for the specific vehicle based on $/kWh electricity costs in the user's ZIP code.

Vehicle and Charging High-Level Communication Standards

Scout Motors welcomes and strongly supports the proposed DC High-Level Communication requirements and conformance testing centered around ISO 15118-2 and Plug & Charge. These requirements will improve interoperability, reliability, and customer confidence in public charging. Scout Motors would further support subsequent adoption of ISO 15118-20—which enables more robust security for Plug & Charge, bidirectional charging, and grid-interactive functions such as dynamic load management—by or after model year 2031. Finally, Scout Motors supports standardization around the SAE J3400 charging inlet and requiring adapters to be certified to UL 2252. Common charging connector requirements improve the customer experience and will help align the industry around a single standard.

Extended Range Electric Vehicle Treatment

Scout Motors appreciates CARB considering a PHEV contribution factor for its proposed NMOG+NOx fleet average standard. For standards such as these that cannot be achieved with a fleet of traditional internal combustion engine vehicles, contributions for all-electric driving must be factored in regardless of whether those miles come from a BEV, EREV, or PHEV. CARB should further extend this rationale to its proposed zero-emission vehicle ("ZEV") requirements, which, unfortunately, fail to provide even partial compliance credit for PHEVs and EREVs. To meet its air pollution and climate change goals, CARB must incentivize and encourage consumers to drive more miles on electric power by recognizing technologies with high utilization factors (*i.e.*, the expected electric-only usage by drivers). As previously shared with CARB, the electric utilization delivered by Scout Motors' EREV is expected to be greater than 80%, which is supported by real-world use data that can be validated by future data as EREV technologies penetrate markets in the U.S. and around the world. Moreover, Scout Motors has collected survey data indicating that more than 20% of current ICE vehicle drivers would transition to a Scout Motors EREV instead of another ICE vehicle as their next car purchase. Put differently, when offered the choice of a Scout Motors EREV, these customers would trade in their ICE vehicle for a Scout EREV but would not do so for a BEV. In light of this, Scout Motors encourages CARB to recognize technologies that deliver high electric utilization provided that future real-world data validates such performance.

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Scout Motors appreciates the opportunity to provide feedback to CARB as it continues to shape its Drive Forward Light-duty Vehicle Program. We are available to provide any additional information or discussion that would be helpful as CARB progresses.

Regards,

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Scout Motors Inc.

Attachment

Driving Range, Costs, & Charging

[Year] [Make] [Model] [*Trim*]

ELECTRIC VEHICLE

Electric Driving Range*

City / Highway driving (70mph)
120 / 170 miles

Combined - Moderate Temps.
150 miles

Combined - Cold Temps. (20°F)
140 miles

Combined - Hot Temps. (95° F)
137 miles

Charging Speed

Public DC Fast Charging (350kW)
+100 miles in 10 mins

Level 2 - 240V (wall charger / dryer outlet)
+24 miles in 1 hr

Level 1 - 120V (standard wall outlet)
+7 miles in 1 hr

Fastest charging between 10% and 80% battery level.
Maximum charging power: 400kW
Bidirectional Charging capable: Yes

Battery Warranty

Text under development

Electric Driving Costs & Efficiency

Traveling 100 miles costs
$6.60 (at 20¢/kWh)

Scan for personalized cost estimates based on your local energy prices.
driveclean.ca.gov/[uniqueID]

Traveling 100 miles uses
33 kWh electricity



Efficiency range of similar models
(Combined driving)

Low emission vehicles reduce harmful emissions that cause climate change and air pollution linked to asthma, heart disease, and cancer.

Compare vehicles and incentives at
DriveClean.ca.gov

CALIFORNIA AIR RESOURCES BOARD