RIVIAN

California Air Resources Board
1001 I Street
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SUBMITTED ELECTRONICALLY TO: cleancars@arb.ca.gov and daniel.garrett@arb.ca.gov

Re: Drive Forward Light-Duty Vehicle Program Workshop

Rivian Automotive, LLC, ("Rivian") participated in the June 22, 2026, workshop presenting CARB's initial concepts for new emissions regulations collectively known as the "Drive Forward" program. We appreciate this opportunity to submit initial feedback on the presentation. We look forward to more detailed dialogue with staff and other stakeholders over the months ahead.

Our brief comments below reflect on select concepts presented at the workshop. As an automaker, we have a compelling interest in potential updates to the state's vehicle regulations including proposals to extend and enhance tailpipe standards and to regulate non-exhaust brake wear emissions. We also appreciate CARB's proposal for a new electric vehicle ("EV") window sticker and the focus on charging reliability and interoperability. We provide feedback on both topics.

We hope you find our reflections and recommendations helpful and look forward to continued dialogue and partnership in realizing the state's objectives.

CARB's Proposed GHG Standards are Achievable and Could be Tightened

Rivian welcomes interest in implementing strategic policy frameworks that support the continued growth and competitiveness of the American auto industry. We stand ready

to work with policymakers and partners in designing smart public policies that support our shared goals. This includes forward-looking emissions standards that spur auto industry innovation, creating jobs and investment in the technologies of the future. Looking ahead, we expect that the fleet of vehicles sold in California can achieve substantial reductions in GHG emissions.

CARB's initial proposal for a tailpipe standard that targets approximately 80 g/mi CO2 in MY2038 is achievable, but should set a floor for the ambition of this rulemaking. For comparison:

- In 2024 the U.S. EPA finalized nationwide GHG standards for light-duty vehicles that targeted a fleet-average emissions rate of 85 g/mi in MY2032.
- In February 2026, the Canadian government announced development of a nationwide GHG standard for light-duty vehicles that initially targets a fleet-average emissions rate of 75 g/mi in MY2035, a target more stringent and achieved three years earlier than CARB's proposed headline goal.

California has historically been the most advanced subnational EV market in North America, and has long outpaced the U.S. as a whole in traditional average fuel economy. There is every reason to believe that the industry can achieve emissions standards in California that outpace national-level requirements in the U.S. or Canada. Moreover, California should carefully consider the supply-side implications of falling behind emissions standards elsewhere in the region.

To that end, Rivian respectfully encourages CARB to consider:

- **Pulling forward the target year for the headline 80 g/mi standard;**
- **Matching or exceeding standards set by the Canadian government** as part of its upcoming rulemaking to preserve California's leadership and the state's 'pull' on clean car supply in the heavily integrated North American market; and,
- **'Frontloading' emissions reductions** with a steeper target curve in the early years of the Drive Forward regulatory window. Long-term uncertainty has unfortunately become a hallmark of the regulatory landscape and California

should strive to achieve aggregate emissions reductions as quickly as possible as a hedge against an unpredictable future.

A thoughtful early action credit program can ensure continued progress until regulations take effect. For example, CARB should allow manufacturers to earn credits until MY2031 for performance against the flat MY2025 GHG standard, up to a declining cap and with a traditional five-year carry-forward limitation. CARB could also consider making bonus credits available to manufacturers who voluntarily meet or exceed Advanced Clean Cars II ZEV sales targets.

Rivian Supports CARB's Proposal to Update the Fleet Utility Factor ("FUF") for PHEVs

As Rivian has commented in the past, and CARB's workshop presentation acknowledged, PHEVs exhibit significant variability in their environmental performance. Simply put, on average PHEV drivers do not plug in their vehicles as much as was previously assumed and the weight of the evidence clearly suggests a need to revise the FUF. An accurate FUF, reflecting CARB's onboard diagnostic data, would ensure that the regulation works as intended—achieving reliable, real-world emissions reductions. Rivian welcomes CARB's intent to develop a revised FUF for use in the next generation of emissions standards.

Consider the Tradeoffs in Ending Air Conditioning ("A/C") Efficiency Credits for EVs

CARB proposes to make EVs ineligible for A/C system efficiency credits. Rivian appreciates the rationale for making EVs ineligible for A/C efficiency credits but encourages consideration of the tradeoffs.

Rivian believes CARB should maintain parity in its treatment of EVs and ICEVs for A/C credit purposes. While AC efficiency directly affects an ICEV's tailpipe emissions, efficiency credits for EVs incentivize manufacturers to develop maximally efficient A/C

systems in those vehicles—a contributing factor to an EV's overall energy efficiency. Energy efficiency is an important value even without a tailpipe impact. While direct regulation of EV efficiency would be premature at this stage, CARB should consider the benefits of regulatory provisions that indirectly incentivize efficiency improvements as the EV fleet grows. To address potential concerns about A/C efficiency credits for EVs—and the resulting 'negative' emissions credited to EV manufacturers—eroding the stringency of the regulation, the agency could increase stringency of the standards correspondingly.

The reality is that A/C efficiency credits for EVs do link to a real-world reduction in energy demand. Rivian understands the agency's argument for eliminating efficiency credits for EVs but believes this would come at a cost. We respectfully encourage CARB to consider the tradeoffs involved and reexamine this proposal.

Reconsider Certain Elements of the Proposed Window Sticker

Rivian broadly supports transparent range and consumption metrics for EVs. We believe that updating the environmental performance label for passenger vehicles is a worthy goal.

The overall direction of the staff proposal appears appropriate. Rivian generally supports publication of highway-speed ranges and estimated charge times as the kinds of performance indicators that EV consumers seek and find helpful.

Yet **Rivian respectfully recommends reconsidering inclusion of Level 1 charge times on window stickers for EVs**.

Too much information can lead to 'label blindness.' CARB should strive to strike a balance between informing car shoppers and overwhelming them. In Rivian's view, the case for crowding the label with Level 1 charging statistics is not compelling.

- Level 1 charging performance is likely to be highly variable, influenced by factors such as ambient temperature.

- While Level 1 charging can meet a need in some cases for some drivers, Rivian data show that almost all home charging of Rivian vehicles is at Level 2 power.
- Particularly for first-time EV owners, Level 1 charging times could be confused with more typical charging times experienced in public charging settings or at Level 2 power at home.

Therefore, we don't believe furnishing a Level 1 charge time on a window sticker provides useful or generally applicable information. It could even be discouraging if not presented with sufficient context to a buyer. We respectfully request that CARB reconsider Level 1 charge times as a window sticker metric.

Provide Common Sense Flexibility for Compliance with Brake Wear Standards

Rivian appreciates CARB's attention to non-exhaust emissions, including brake wear. Rivian does not take issue with establishing brake wear standards. However, we reiterate prior comments **recommending an evaluation of a single technology-neutral, fleet-average standard** as opposed to unique standards for EVs versus internal combustion engine vehicles ("ICEVs"). A fleet average standard applied across both ICEVs and EVs in a given vehicle category–and employing traditional averaging, banking, and trading of compliance credits–is a proven approach that might achieve aggregate reductions in brake wear emissions across the fleet at lower cost while creating incentives for manufacturers to innovate in pursuit of overcompliance.

If CARB elects to proceed with unique standards for EVs and ICEVs, **Rivian recommends pursuing opportunities to minimize the compliance burden for industry.** This could be achieved, for example, by establishing a "deemed to comply" pathway allowing manufacturers to achieve compliance with California requirements using Euro 7 certification for vehicle types sold in both markets.

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Conformance and Interoperability

High Level Communication ("HLC") Standards and Conformance Test

We continue to support CARB's efforts to require conformance testing in order to ensure widespread reliable charging as the industry scales. In addition, we specifically appreciate CARB enabling automakers to self-test and report conformance testing results in the current proposal. However, given the currently proposed timeline of MY 2031 combined with the evolution of the industry over the last few years, we encourage CARB to re-engage with industry on the status of ISO 15118-20 implementation to determine whether it should also be considered in addition to ISO 15118-2.

J3400 Charging Inlet Standardization

Move up the model year compliance date for SAE J3400

We strongly support the proposal to require all plug-in vehicles to meet the requirements in SAE J3400. Given the continued transition of both electric vehicle and charger manufacturers from the CCS standard to SAE J3400, we encourage CARB staff to consider moving up the requirement date from MY 2031 to an earlier model year. Moving forward the compliance date to MY29, at a minimum, will send a critical signal to the industry and ultimately enable a quicker transition to a future with minimal adapter use.

Although adapters are safe, readily available from automakers, and critical to enabling the industry's transition to SAE J3400, they do not provide an ideal consumer charging experience. The ideal experience is achieved with a native charging inlet to a native charging connector as it provides the most streamlined and reliable charging experience for drivers. The currently proposed MY 2031 timeline sends the wrong signal to industry and will allow for more adapters to be used for a longer period of time. Encouraging adapter use for a longer period of time will negatively impact drivers' charging experiences and ultimately, overall EV adoption. We therefore encourage

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CARB to send a stronger, nearer term market signal and set the compliance model year at MY 2029 at a minimum. An earlier compliance model year will encourage the industry to transition to a one connector future more quickly and reduce any negative impacts on overall EV adoption.

We also strongly support the requirement that all adapters are UL 2252 certified, which is critical to ensure safe and reliable charging. This requirement would also benefit from a compliance deadline earlier than MY 2031 as it is readily achievable by manufacturers today.

Consider the addition of ISO 15118-202

With regards to adapters, we also encourage the Board to consider including a requirement for vehicles to implement ISO 15118-202 which specifically enables the identification of whether an adapter is being used during a charging session and take additional action as needed to ensure a successful and safe charging experience, such as derating. ISO 15118-202 was published as a Publicly Available Specification (PAS) by ISO in September 2025 to allow industry to quickly adopt and implement it. While the formal standardization process occurs, several automakers have implemented it or are in the process of implementing it given its value of detecting adapters. In order for ISO 15118-202 to achieve its full value however, it needs to be implemented by both the vehicle and the charger. Therefore, CARB could send an important market signal to charging manufacturers to enable the protocol if vehicles are required to implement it.

Conclusion

Thank you for the opportunity to provide feedback and comments. Please contact Tom Van Heeke (tvanheeke@rivian.com) with any questions. We look forward to future workshops and additional discussions with staff.

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