

Contacto CONAMER

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De: Lyons, Allen@ARB <allen.lyons@arb.ca.gov>
Enviado el: martes, 27 de noviembre de 2018 04:11 p. m.
Para: Mario Emilio Gutiérrez Caballero
CC: Contacto CONAMER
Asunto: Comments for NOM-163
Datos adjuntos: HQ-06-CL5070A_20181127_142700.pdf

Estimado Mtro. Gutiérrez Caballero:

Please find the attached comments from the California Air Resources Board regarding the proposed amendments to NOM-163-SEMARNAT-ENER-SCFI-2013. Thank you for the opportunity to provide input into this important effort.

Best Regards,

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November 27, 2018

Mtro. Mario Emilio Gutiérrez Caballero
Comisionado Nacional
CONAMER

Dear Mr. Gutiérrez Caballero:

Thank you for the opportunity to provide comments on behalf of the California Air Resources Board (CARB) in support of SEMARNAT's proposed amendments to NOM-163-SEMARNAT-ENER-SCFI-2013, which would update Mexico's carbon dioxide (CO₂) standards related to fuel economy for new light-duty vehicles. As you are aware, alignment of Mexico's greenhouse gas (GHG) emission standards for these vehicles with those sold in the U.S. was a key goal of the recently concluded Memorandum of Understanding (MOU) between California and Mexico. CARB applauds SEMARNAT for the stringent targets proposed, and believes that with some additional refinements, the finalized standard will provide for very substantial reductions in GHG emissions within Mexico.

Although the numeric standards proposed by SEMARNAT are strong, CARB believes that refinements to the credit provisions within the proposal are necessary to ensure the effectiveness of the standards is not undermined. Specifically, credit multipliers of 18 for electric vehicles and up to nearly 10 for plug-in hybrid vehicles are several times greater than the corresponding credits allowed under United States (U.S.) GHG regulations, and they extend farther into the future than the multipliers in the U.S. requirements. Further, U.S. requirements do not currently provide for any credit multiplier for conventional hybrid vehicles because widespread introduction of these vehicles is already established, and their benefits are already generally accounted for by the standard fuel economy tests. All multipliers result in some loss of GHG benefits. CARB is concerned that the excessively large and prolonged credit multipliers for advanced technology vehicles proposed by SEMARNAT will have the effect of weakening the emission standards for the majority of the new vehicles that will be offered for sale in Mexico by the introduction of relatively very few advanced vehicles, resulting in substantial losses in benefits for the program. CARB encourages SEMARNAT to revise these credit multipliers downward for its final regulations and to phase them out entirely over the course of the seven-year regulatory program.

SEMARNAT's proposal also requires consideration of advanced technology vehicle sales in the U.S. or the European Union (EU) as part of the credit calculation. While CARB understands that this provision may work to act as a cap for the amount of credits a manufacturer can receive, CARB does not see any programmatic reason why

the cap should be structured in this way. Further, the multipliers applied to SEMARNAT's calculation extend through model year 2025 under SEMARNAT's proposal, but end in model year 2021 under U.S. regulations, which increases the credits permitted well beyond what would be allowed for the U.S. fleet. CARB recommends that SEMARNAT revise this aspect of the credit calculation to include a credit cap mechanism for Mexico that is based solely on the balance between the availability of adequate incentives to vehicle manufacturers for the introduction of advanced vehicles and program effectiveness in reducing GHG emissions.

Unlike credit multipliers, CARB believes that credits for technologies that provide CO₂ benefits "off-cycle" should not result in any loss of benefits. Instead, these credits offer a valuable incentive for manufacturers to develop and implement technologies that reduce real world CO₂ emissions during driving conditions that are not encountered on the standard fuel economy test cycles. In order to ensure that these credits do not result in a loss of GHG benefits, it is critical to quantify the actual benefits realized by each technology and to only provide the level of credits matching the exact benefit of the technology deployed. As it is currently written, the NOM-163 proposal appears to provide what is the credit maximum under the U.S. standard for any individual technology designed to reduce emissions off of the test cycles. The proposal does not provide clear guidance on technology-specific credits or a process for strict accounting for technology deployment. As a result, CARB believes that the current proposal could result in unnecessary and substantial losses in program benefits. CARB recommends that the proposal be modified to incorporate the technology-specific credit menus and equations that are in the U.S. standards, clearly identifying 6.25 g/CO₂/km as the fleet average credit maximum. Similarly, credits awarded for more efficient and lower-leak air conditioning system designs should be based on the expected benefits of the specific individual design elements that are implemented. Providing a fixed credit benefit regardless of which or how many improvements are made will likely result in credits that are significantly disproportionate to the actual emission benefits that Mexico will realize.

Regarding the scope of the standards, while CARB understands that the rule is targeted primarily towards fuel economy improvements for the light-duty fleet, CARB recommends including standards for other GHGs such as methane and nitrous oxide, which have significantly greater global warming potential relative to an equivalent mass of CO₂. This comprehensive approach to the reduction in GHGs from these mobile sources has precedent in other parts of the world, is technically feasible, cost effective, and would further still yet Mexico's contribution to the international GHG reduction efforts to which it is a partner.

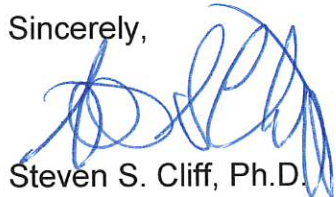
In order to provide a proper incentive for timely action over the lengthy program timeline, CARB recommends that compliance be determined on a yearly basis, not at

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the end of the proposed nine-year period. Under California and U.S. regulations, credits for emissions reductions beyond the required levels can be carried forward for five years, while debits may not be carried beyond three years. Allowing automakers to carry debits over the full nine-year period could result in manufacturers delaying introduction of cleaner vehicles to resolve the debits until it is too late. Even if manufacturers submit compliance reports on an annual basis, delaying any potential enforcement action until after the final program year may also not provide SEMARNAT with the tools needed to ensure program success.

In closing, CARB thanks and congratulates Mexico on its commitment to reduce GHG emissions from its light-duty fleet consistent with the goals of existing international agreements and the working relationship between Mexico and California. CARB stands committed to providing any assistance needed to strengthen and finalize the proposed amendments to NOM- 163. Please let us know if you have any questions, or need additional information, by contacting Mark Fuentes at (626) 575-6815 or Mark.Fuentes@arb.ca.gov.

Sincerely,



Steven S. Cliff, Ph.D.
Deputy Executive Officer

cc Richard Corey, Executive Officer
Ing. Luis Felipe Acevedo Portilla