

November 21, 2025

California Air Resources Board
Docket Unit, MS-4
1001 I Street, Sacramento, CA 95814

Re: California Air Resources Board's ZEV Drive Forward Initiative – Tesla Comments

Dear California Air Resources Board,

Thank you for the opportunity to submit comments regarding the proposed Zero Emission Vehicle ("ZEV") Drive Forward Initiative, as detailed in the October 21, 2025, and November 13, 2025, California Air Resources Board ("CARB") workshops. We welcome CARB's guiding principles to design effective, but flexible, programs and incentives that continue advancing ZEV adoption and emission reduction in California. Tesla has participated in CARB's Advanced Clean Cars I ("ACCI") and Advanced Clean Cars II ("ACCI") programs since their establishment. Our comments provided here, regarding California's future regulatory framework for ZEVs, offer Tesla's initial feedback on the agency's high-level proposals. As the company has done in the past, Tesla intends to participate through the informal and formal rulemaking process as CARB further develops its proposals.

ZEV Certification / State-level Homologation Requirements

Our comments apply to both early action incentives, as being considered in the interim period before new regulations become effective, and any long-term regulation created out of this rulemaking process. We also provide comment on current approaches to matters including vehicle certification. There are several areas where Tesla recommends that CARB consider simplifying or streamlining requirement to reduce unnecessary burdens on zero emission vehicle manufacturers.

Early Action Incentives

CARB outlined that any regulations under consideration would not take effect until model year ("MY")2031, however, OEMs would still be able to earn credits against MY2025 standards for the interim period. Tesla is directionally supportive of early action incentives that lead to meaningful and real pollution reduction provided that the impacts on the credit market are moderated. Excessive crediting through early action incentives that leads to large quantities of excess credits in the market ultimately reduces compliance obligations overall and works

contrary to California's objectives. Tesla looks forward to reviewing and providing comment on any proposed early action incentives when those proposals are available for review.

Window Sticker

CARB referenced a new draft window sticker for EVs that includes the display of driving range, speed, and battery warranty. Tesla recommends that the EPA range reported to that agency, and which is generally used by OEMs to market EV range in their advertising, be used to represent range on any revised window sticker. Minimizing customer confusion is critical in continuing to accelerate EV adoption. EPA range estimates are presently widely accepted as the standard across the US (and Canada) -- effectively becoming the continental standard. If there is a deviation from this, CARB should provide time for the industry to adapt so that customer confusion may be minimized from different range details in advertising that could appear online across different markets in the country for the same vehicle.

High-Level Communication Standards and Conformance Test

CARB referenced that it is considering high-level communication standards and conformance testing requirements for maintaining a charge session. Regarding Plug & Charge (PnC) requirements or ISO 15118 (-2/-20), Tesla supports PnC broadly and recommends allowing flexibility between the different ISO 15118 types. However, as these regulations aren't planned to go into effect until MY 2031, there are likely to be changes in communication standards and appropriate conformance testing in the interim. If regulating, ensure that there is sufficient flexibility to swiftly update those rules as needed to meet ever-evolving industry standards.

Charging Connector and Inlet Requirements

For both current and future regulation, Tesla strongly recommends that ZEV certification and regulation align with the current industry standards, which call for use of the J3400 NACS connector and inlets. Additionally, we recommend the removal of requirements for each vehicle to provide a convenience charging cord, a CCS1 adapter, and a J1772 adapter. All of these are rarely used by drivers and result in unnecessary equipment costs (impacting EV affordability), creating electronic-waste, and leading to manufacturing / operational complexities. Additionally, given that autonomous vehicle technology and its associated charging infrastructure continues to rapidly evolve, it is important to provide a technology agnostic pathway for these vehicle types that does not limit adoption to a specific charging connector or inlet.

Autonomous Vehicle Certification Pathway

The ACCII rule included no clear certification and credit generation pathway for autonomous vehicles ("AV") given the compliance requirements that misalign with how AVs may be designed to operate. This is seen already in the ACCII Certification Range Value, 1962.3 Charging, 1962.8 ZEV Warranty Requirements, and capabilities for fleet AV uses. We urge

CARB to modify certification requirements for AVs (now and for the future) or establish a special certification pathway for AVs (now and for the future) as outlined below.

Tesla continues to propose two separate certification pathways:

Standard Certification. ZEVs AVs should be eligible for Standard Certification if they otherwise meet certification requirements, regardless of being AVs. A ZEV AV could be certified per the standard CARB ZEV certification process when these vehicles meet all of CARB's regular certification requirements. The inclusion of an ADS, or over the air delivery of an ADS in future, should not impact ARB's certification approach for an otherwise certifiable ZEV.

Special Certification. Enable a Special Certification pathway for ZEV AVs that don't meet certain requirements and which operate in fleets. While we recognize CARB's goal that consumers should be able to expect certain standards for warranty, durability and servicing, this class of vehicle would not be owned by individual consumers and should therefore not be required to meet the same certification requirements.

To elaborate further, CARB could provide special certification if:

- a. The OEM provides attestation that vehicle is going to be used exclusively in its own AV Network fleets (directly or via a wholly owned subsidiary) and that it will never be sold to non-fleet customers; or,
- b. The OEM provides attestation that the vehicle will be sold or leased to a third-party fleet operator and that the terms of initial sale further restrict that buyer from re-selling the vehicles purchased to non-fleet operators.

The Special Certification pathway should persist as long as standard certification is required in California and should enable ZEV crediting.

Vehicle Range Testing

ACCII Subsection 1962.4(i)(2)(A)(1) currently requires California-specific range testing per SAE J1634 (as issued 2021-04) in addition to EPA testing per SAE J1634 (as issued 2017-04) on each vehicle. This results in costly and duplicative testing for each vehicle without meaningful value of additional testing as CARB has already acknowledged that the range impact is minimal between both testing requirements. For both current and future regulations, we recommend that CARB allow compliance with either California SAE J1634 (as issued 2021-04) or EPA testing SAE J1634 procedures (as issued 2017-04). Additionally, ACCII Subsection 1962.4(i)(3)(D)(2) requires a complicated permutation of range value testing that has increased the amount of testing per vehicle variant to several months or more. We further recommend that CARB eliminate the requirement for confirming analytically derived range

values with actual testing results or revert to ACCI-like standards which specified that the manufacturer only needed to provide the worst-case sub configuration.

Battery Labeling

ACCII Subsection 1962.6 (b)(2)(A) required that each battery module be labeled and that every module label match within a vehicle, which limits module mixability within a vehicles pack creating unnecessary restrictions in the manufacturing and operations process which can result in module waste for packs that are not identically labeled. We note that recent Manufacturer's Advisory Correspondence (MAC) guidance has addressed this issue with ACCII but these provisions will need to carry forward into any future rulemaking.

We also recommend for a future regulation that CARB remove the module-level label requirement completely and rely on pack and vehicle labeling.

Greenhouse Gas Reductions Regulatory Considerations

Tesla is supportive of robust regulations that reduce air pollution of all types, and which promote the adoption of ZEVs, given their known (and extensive) economic and public health benefits in California. For this reason, Tesla is directionally supportive of CARB taking further action to advance clean air regulation through the various approaches presented in the workshops. Increasing the stringency of emissions reduction regulations and establishing new ones is desirable. Wherever possible, do so leveraging regulatory, market-based, mechanisms which have a proven track record of success in California. In particular, Tesla encourages ongoing increases to stringency within both the NMOG and GHG programs.

Tesla also supports using test procedures and measurements that better reflect the real-world GHG performance of combustion vehicles (including plug-in hybrids).

Design Options for ZEV Market Advancement

CARB outlines several potential regulatory design options to continue advancing the ZEV market. These range from a fleet average standard that includes ZEVs, to a minimum floor, and anti-backsliding provisions. Tesla remains directionally supportive of agency actions that continue to advance ZEV adoption and which minimize burden to those automakers that are exceeding the state's objectives and which maximally encourage a transition to ZEVs. As noted above, where new mechanisms are established consider using credit-based, market mechanisms, for their implementation wherever possible given the success of these mechanisms in California to date.

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We look forward to continued engagement with CARB as the agency further refines and develops its ZEV Drive Forward Initiative proposals and as draft regulatory text becomes available.

Tesla, Inc.