

## Comments

**Alternative Methods for Calculating Off-Cycle Credits Under the Light-Duty Vehicle Greenhouse Gas Emissions Program: Application From Jaguar Land Rover North America, LLC  
EPA-HQ-OAR-2024-0345**

**October 23, 2024**

The Alliance for Automotive Innovation<sup>1</sup> is pleased to comment in support of Jaguar Land Rover's off-cycle credit application for 48-volt efficient motor-generator in combination with a 48-volt / 12-volt DC/DC converter technology.<sup>2</sup>

The methodology proposed by Jaguar Land Rover is based on the approach taken to quantify the emissions and fuel economy benefits of high-efficiency alternators. As EPA is aware, alternative method credits for high-efficiency alternators have been granted to multiple manufacturers, and EPA subsequently also incorporated the credit and calculation methodology with other standardized credits at 40 CFR § 86.1869-12(b).

The technology described by the applicant operates in a manner analogous to 12-volt high-efficiency alternators by using the motor-generator to provide electrical energy through the DC/DC converter to maintain and operate the 12-volt electrical system architecture in the subject vehicles. It is a logical extension to provide a similar credit for the subject technology given this parallel.

We recommend that EPA approve the subject application as soon as possible. Furthermore, EPA should also proceed with any similar applications it may still be considering.

Thank you again for this opportunity to comment. If you have any questions, please contact Mike Hartrick at [mhartrick@autosinnovate.org](mailto:mhartrick@autosinnovate.org).

Cc. Maurice Hicks, National Highway Traffic Safety Administration

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<sup>1</sup> Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to maintain U.S. competitiveness in cutting-edge automotive technology. Representing approximately 5 percent of the country's GDP, responsible for supporting nearly 10 million jobs, and driving \$1 trillion in annual economic activity, the automotive industry is the nation's largest manufacturing sector. [www.autosinnovate.org](http://www.autosinnovate.org).

<sup>2</sup> See Environmental Protection Agency, Alternative Methods for Calculating Off-Cycle Credits Under the Light-Duty Vehicle Greenhouse Gas Emissions Program: Application From Jaguar Land Rover North America, LLC, 89 Fed. Reg. 77509 (Sep. 23, 2024). See also Jaguar Land Rover North America, LLC, "Application for 48 Volt efficient motor-generator combined with a 48 Volt/12 Volt DC/DC Converter Off-Cycle GHG Credit" (Feb. 3, 2023), available at <https://downloads.regulations.gov/EPA-HQ-OAR-2024-0345-0003/content.docx>.