

Updates to Energy & CO₂ Rates for Light-Duty Vehicles with SAFE Rule

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Background

- The Safer Affordable Fuel-Efficient (SAFE) Part I Final Rule released in September 2019 - One National Program
 - EPA withdrew the Clean Air Act preemption waiver for LD vehicles it granted to California
- SAFE Part II FRM released in March 2020
 - Fuel economy and carbon dioxide standard changes for MY2021-2026
- Reduction of CO₂ emission is less stringent
 - Previous EPA program (LD GHG phase 2 MY2017-2025 rule): Fleet Target CO₂ reduction ~ 5%/year
 - SAFE FRM: Fleet Target CO₂ reduction ~ 1.5%/year



What are "Fleet Targets" in LD GHG Phase 2 and SAFE?

Standards include updates in historical years starting in MY2017

CO₂ Emission Rate Fleet Target for Light Duty Passenger Cars

Passenger cars, CO2 g/mile	LD	GHG rule phase 2	SAFE FRM	
MY 2017		212	219	
MY 2018		202	208	
MY2019		191	197	
MY 2020		182	188	
MY2021		172	183	
MY2022		164	180	
MY2023		157	177	
MY2024		150	174	
MY2025		143	171	
MY2026		143	168	1
MY2026 +		143	168	

CO₂ Emission Rate Fleet Target for Light Duty Passenger Trucks

Light trucks, CO2 g/mile	LD GHG rule phase 2	SAFE FRM
MY 2017	295	295
MY 2018	285	285
MY2019	277	278
MY 2020	269	270
MY2021	249	264
MY2022	237	259
MY2023	225	255
MY2024	214	251
MY2025	203	247
MY2026	203	243
MY2026 +	203	243

Standards become constant starting in MY2025 for GHG rule Standards become constant starting in MY2026 for SAFE rule



Ref: Federal Register/Vol.77, No. 199/Monday, October 15, 2012/Rules and Regulations (2017-2025 LD GHG FRM) Federal Register/Vol. 85, No. 84/Thursday, April 30,2020/Rules and Regulations (SAFE FRM)

MOVES uses "Real-World" CO₂ Rates

"Fleet Target" CO₂ rates vs. "Real-World" CO₂ rates

- "Fleet Target" CO₂ rates
 - National Highway Traffic Safety Administration (NHTSA)'s Corporate Average Fuel Economy (CAFE) Test (MPG)
 - 2 Cycle Test: FTP + HFET
- "Real-World" CO₂ rates
 - "These real world estimates, similar to values shown on new vehicle labels, reflect the fact that the way cars and trucks are operated in the real world generally results in higher CO₂ emissions and lower fuel economy than laboratory test results used to determine compliance with the standards."^a
 - EPA Fuel Economy Label (MPG) 5 Cycle Test^b :

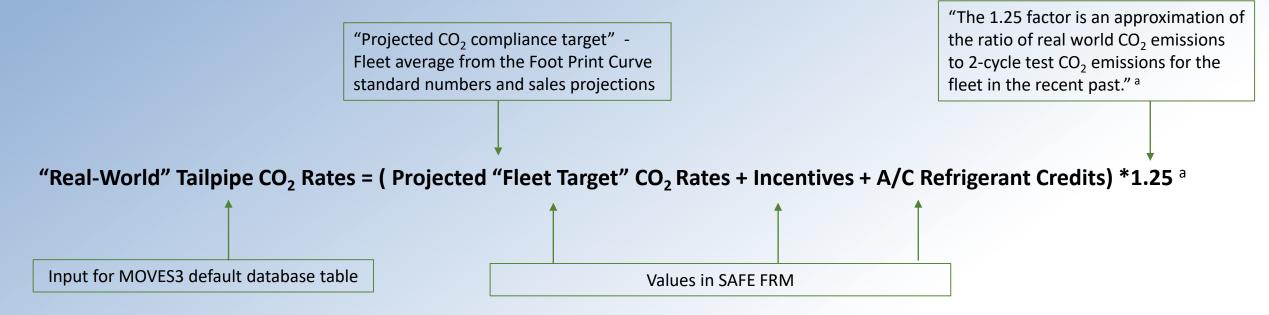




^a Ref: 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards, Federal Register, Vol 77, No.199, October, 2012 ^b Ref: https://www.epa.gov/vehicle-and-fuel-emissions-testing/dynamometer-drive-schedules#vehicleDDS

How to Calculate "Real-World" CO₂ Rates based on "Fleet Target"?

• SAFE FRM has "Fleet Target" CO₂ rates, but no "Real-Word" CO₂ rates



 "In the real world, fuel economy is, on average, about 20% lower than as measured under regulatory test procedures." ^b



^a Ref: 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards, Federal Register, Vol 77, No.199, October, 2012 ^b Ref: Final Regulatory Impact Analysis, The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Year 2021 – 2026 Passenger Cars and Light Trucks

How do we Incorporate SAFE into MOVES?

- SAFE Part I (One National Program) rule
 - Incorporated into MOVES so states can model if desired
- SAFE Part II (CAFE changes)
 - "Real-World" CO₂ rates estimated using Projected "Fleet Target" CO₂ rates, Air Conditioning (A/C) Refrigerant Credits, and Incentives from SAFE FRM
 - Calculate adjustment ratios based on LD GHG Phase 2 rule and SAFE FRM "Real-World" CO₂ rates
 - Applied ratios for:
 - PolProcess 9101 (Total Energy Consumption/Running Exhaust) and 9102 (Total Energy Consumption/Start Exhaust)
 - Source Types 21 (Passenger Car), 31 (Passenger Truck), and 32 (Light Commercial Truck)
 - Regulatory Class 20 (Light Duty Vehicles) and 30 (Light Duty Trucks)
 - Adjustment ratios vary by MY from MY 2017 to MY 2026
 - Applied adjustment ratios to historical MY 2017 to MY2020 to account for updated information used in SAFE rulemaking
 - CO₂ standards for MY2026 applied to MY2027 and later



How do we Incorporate SAFE into MOVES?

		F	Passenger Ca	rs in Emis	sionRateA	djustment Table	in MOVES Defa	ault Database
		polProcessID	sourceTypeID	regClassID	fuelTypeID	beginModelYearID	endModelYearID	emission Rate Adjustment
		9101	21	20	1	2017	2017	1.029891304
		9101	21	20	1	2018	2018	1.026315789
		9101	21	20	1	2019	2019	1.026470588
	ing	9101	21	20	1	2020	2020	1.033811475
unning		9101	21	20	1	2021	2021	1.057692308
		9101	21	20	1	2022	2022	1.08632287
		9101	21	20	1	2023	2023	1.109302326
		9101	21	20	1	2024	2024	1.145121951
		9101	21	20	1	2025	2025	1.178571429
		9101	21	20	1	2026	2060	1.159438776
		9102	21	20	1	2017	2017	1.029891304
		9102	21	20	1	2018	2018	1.026315789
		9102	21	20	1	2019	2019	1.026470588
		9102	21	20	1	2020	2020	1.033811475
art	<u>ا</u>	9102	21	20	1	2021	2021	1.057692308
-		9102	21	20	1	2022	2022	1.08632287
		9102	21	20	1	2023	2023	1.109302326
		9102	21	20	1	2024	2024	1.145121951
		9102	21	20	1	2025	2025	1.178571429
		9102	21	20	1	2026	2060	1.159438776

plied adjustment ratios to historical MY 7 to MY2020 to account for updated prmation used in SAFE rulemaking

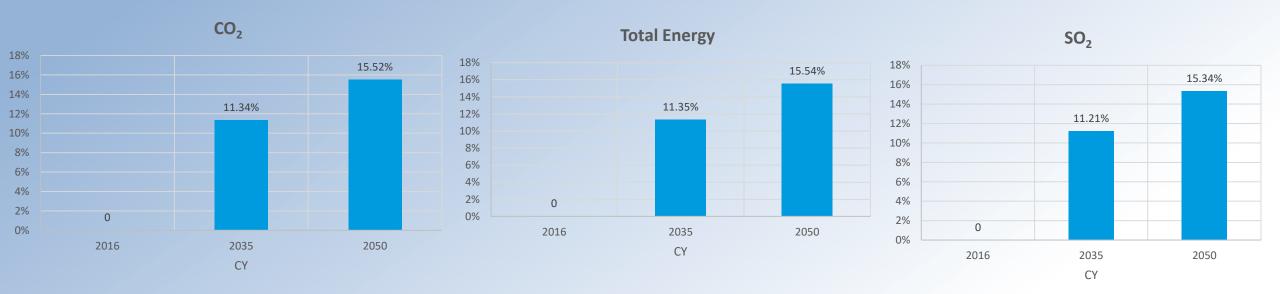
standards for MY2026 continue for ire model years

plied the same adjustment ratios to start or running



Applied the same adjustment ratios to diesel as for gasoline

Emission Impacts: Light-duty Fleet

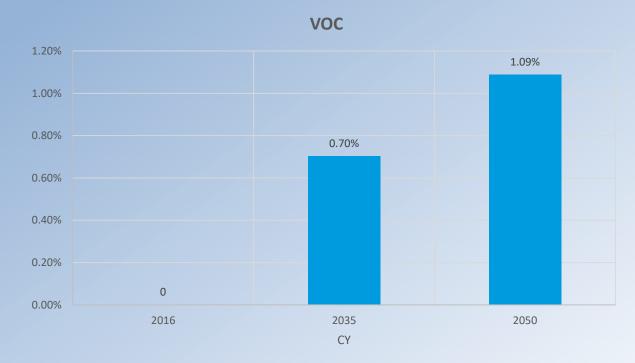


- National, all fuel types, by Calendar Years (CY)
- All light duty vehicles (passenger cars, passenger trucks, and light commercial trucks)
- MOVES estimates SO₂ as proportional to fuel consumption



Based on preliminary MOVES results

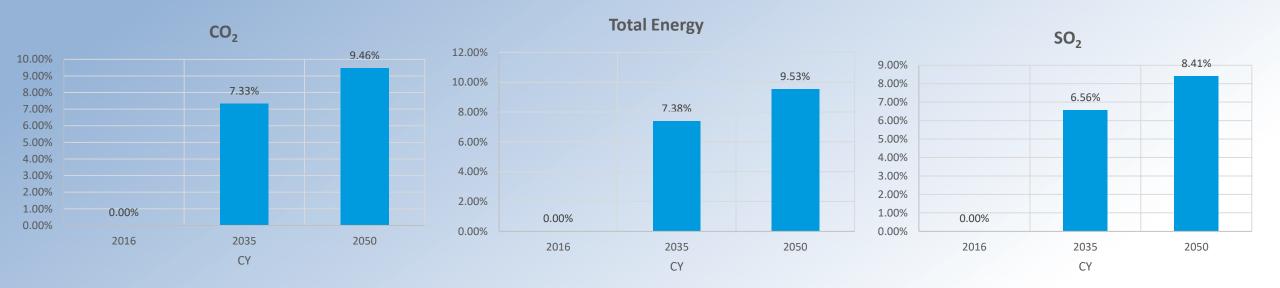
Emission Impacts: Light-duty Fleet



- National, all fuel types, by Calendar Years (CY)
- All light duty vehicles (passenger cars, passenger trucks, and light commercial trucks)
- The increases in VOC are due to more refueling/lower fuel economy
- No impact on NOx and PM



Emission Impacts: Onroad Fleet

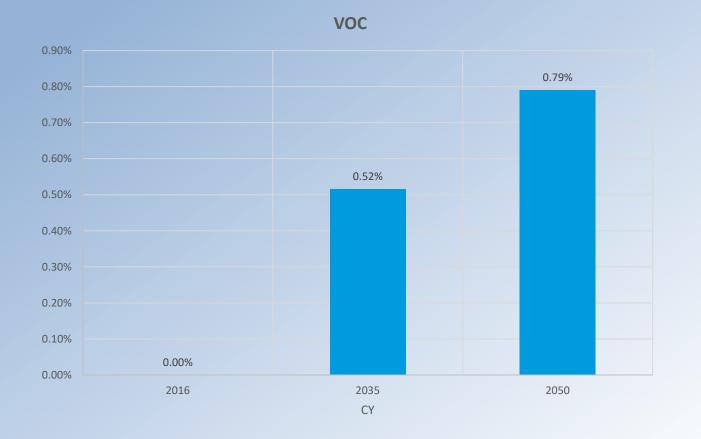


- National, all source types, all fuel types, by Calender Years (CY)
- Emissions change is less than the emissions change for just light-duty fleet
- Percent change in emissions increase in future years due to fleet turnover



Based on preliminary MOVES results

Emission Impacts: Onroad Fleet



- National, all source types, all fuel types, by Calender Years (CY)
- Small change on VOC due to refueling
- No impact on NOx and PM



Based on preliminary MOVES results

Conclusion

- SAFE Part I (One National Program) rule was incorporated
- SAFE Part II (CAFE changes):
 - Moderate (~15%) increases in future year LD energy consumption and CO₂;
 - About a 10% increase in total onroad CO₂ (LD+HD)
 - Small (~1%) increases in VOC and toxic emissions due to refueling
- Overall, the percent change in light-duty CO₂ emissions is what is expected from the change in the standard



APPENDIX



Derivation of "Real-World" CO₂ Calculation

The real world tailpipe CO₂ emissions projections are calculated starting with the projected ٠ 2-cycle CO2 emissions values, subtracting the air conditioner efficiency and off-cycle credits, and then multiplying by a factor of 1.25.^a

CARS ⁴⁰¹											
[Grams per mile]											
	Projected CO ₂ compli- ance target	Incentiv	/es ⁴⁰²	Projected achieved CO ₂							
Model year		Advanced technology multiplier	Intermediate volume pro- visions		Off cycle credit	A/C refrig- erant	A/C efficiency	Projected 2- cycle CO ₂			
2016 (base)	225 403	0	0	225	0.4	5.4	4.8	235			
2017	212	0.6	0.1	213	0.5	7.8	5.0	226			
2018	202	1.1	0.3	203	0.6	9.3	5.0	218			
2019	191	1.6	0.1	193	0.7	10.8	5.0	210			
2020	182	1.5	0.1	183	0.8	12.3	5.0	201			
2021	172	1.2	0.0	173	0.8	13.8	5.0	193			
2022	164	0.0	0.0	164	0.9	13.8	5.0	184			
2023	157	0.0	0.0	157	1.0	13.8	5.0	177			
2024	150	0.0	0.0	150	1.1	13.8	5.0	170			
2025	143	0.0	0.0	143	1.4	13.8	5.0	163			

TABLE III-1-EPA PROJECTIONS FOR FLEETWIDE TAILPIPE EMISSIONS COMPLIANCE WITH CO2 STANDARDS-PASSENGER



Credits and Incentives in SAFE

- Air Conditioning (A/C) credits
 - A/C refrigerant credits (aka leakage credits), and A/C efficiency credits
 - All vary by model year and for cars or trucks
 - SAFE A/C leakage credits stays the same as in GHG rule
 - SAFE adds one technology (advanced A/C compressor) to the A/C efficiency credits menu
- Incentives
 - Electric Vehicle(EV) incentives
 - Vary by MY, EV types, and for cars and trucks
 - SAFE eliminates EV incentives for trucks starting MY2022
 - 0 g/miles upstream incentive (Not appliable for MOVES only tailpipe emission)
 - CNG incentives (Not appliable for MOVES since there are no CNG LD vehicle)



Energy and CO₂ Calculations in MOVES

- Energy rate is calculated based on lab tested CO₂, CO, HC emission rate, H:C ratio, and Heating value for different type of fuel
- MOVES output based on energy rate:
 - Fuel consumption $Fuel (gallons) = Energy (KJ) \times \left(\frac{1}{energyContent}\right) \left(\frac{g}{KJ}\right) \times \left(\frac{1}{fuelDensity}\right) \left(\frac{gallons}{g}\right)$
 - Energy Content (KJ/g) for each fuel subtype Lower Heating Values (LHVs)
 - CO₂ emission

 $CO_2 = Total Energy Consumed \times Carbon Content \times Oxidation Fraction \times \left(\frac{44}{12}\right)$

• Carbon content (g/KJ): values were developed for each fuelTypeID for MOVES2004 derived from the life-cycle model GREET. Currently assume oxidation fraction is 1 for all the hydrocarbon-based fuels

$$SO_2(g) = FC(g) \times [S](ppm) \times \frac{MW_SO_2}{MW_S} \times fSO_2 \times \left(\frac{10^{-6}}{ppm}\right)$$

• [S]: relative fuel-sulfur concentration, fSO₂: fraction of fuel sulfur that is converted to gaseous SO₂ emissions

