

# GENERAL MOTORS

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FE 6352

Mr. Linc Wehrly, Director, Compliance Division  
Light-Duty Vehicle Center  
Office of Transportation and Air Quality  
U.S. Environmental Protection Agency  
2000 Traverwood Drive  
Ann Arbor, MI 48105

Mr. Wehrly:

**General Motors LLC Request for 2010-2013 MY Off-Cycle  
Greenhouse Gas Credits Based on Alternative Methodologies**

Pursuant to the provisions of 40 CFR § 86.1869-12(d), General Motors LLC requests off-cycle greenhouse gas credits for the following technologies used on 2010 through 2013 model year vehicles:

- High efficiency exterior lights,
- Active aerodynamic improvements (grill shutters),
- Engine idle start-stop,
- Active engine warm-up,
- Active seat ventilation or cooling,
- Solar management glass, and
- Solar reflective surface coatings.

Default off-cycle credit values are available for each of these technologies beginning in the 2014 model year. All of these technologies are described in the EPA list of predetermined and pre-approved off-cycle credits for 2014 and later model years. By way of this application, General Motors is seeking credit for these technologies for 2010 through 2013 based on alternative methodologies which are generally consistent with those methodologies which EPA used in establishing the predetermined and pre-approved credit value list. Accordingly, the amount of off-cycle credit requested for each technology is also generally consistent with the default values on the pre-approved list for 2014 and later years.

Each of the technologies in this request was included in similar requests for pre-2014 off-cycle credits made by either Ford Motor Company or FCA, as published by EPA for public comment in the June 3, 2015 Federal Register (Fed. Reg., Vol. 80, No. 106, June 3, 2015, p. 31598). The alternative methodologies used by General Motors in this application are the same as the methodologies used by either Ford or FCA for the same technologies in their requests. In September 2015, EPA issued a Decision Document (EPA 420-R-15-014) which approved the Ford and FCA credit requests without modification, stating that:

“EPA received no adverse comments regarding the credits sought from these technologies by FCA, Ford, and GM, and is hereby approving the technologies, methodologies for determining credits, and credit levels as described in the applications from the manufacturers and in the *Federal Register*.” (EPA Decision Document, p. 1).

Regarding the FCA credit request, EPA stated:

“EPA did not receive any adverse comments on the application from FCA. EPA has evaluated the application and finds that the methodologies described therein are sound and appropriate. Therefore, EPA is approving the credits requested by FCA.” (EPA Decision Document, p. 3)

EPA subsequently made exactly the same statement regarding the Ford credit request, finding that the methodologies were “sound and appropriate” (EPA Decision Document, p. 4).

Attachment A of this petition contains a description of the technologies and the methodologies used to quantify off-cycle credits. As previously discussed, each of these methodologies has been deemed by EPA in its September 2015 Decision Document to be “sound and appropriate” for this purpose, and EPA in that document approved these “technologies, methodologies for determining credits and credit levels”. Attachment B shows the detail of which General Motors vehicles use the technologies in each year in 2010-2013, the volumes of these vehicles, and how much in total off-cycle greenhouse gas credit is being requested. Please treat Attachment B as Confidential Business Information, since public disclosure of this information would be of value to our competitors and would place General Motors at a competitive disadvantage.

Based on the alternative methodologies described in Attachment A, General Motors LLC requests approval of the off-cycle greenhouse gas credit amounts shown in Attachment B.

Thank you for your consideration of this application for off-cycle greenhouse gas credits.

Sincerely,



Frederick S. Sciance, Manager  
General Motors Public Policy Center

#### Attachments

c: Roberts French  
Robert Babik  
Sandra Bowers  
Dave Garrett  
Barbara Kiss  
Matt Rudnick  
David Schrumppf