

Impact of real vehicle mileage on CO2 banking system



§ 600.311–12 Determination of values for fuel economy labels.

(e) *Annual fuel cost.* Calculate annual fuel costs as follows:

(1) Except as specified in paragraph (e)(3) of this section, calculate the total annual fuel cost with the following formula, rounded to nearest \$50:

Annual Fuel Cost = Fuel Price/MPG x Average Annual Miles

Average Annual Miles = The estimated annual mileage figure provided by EPA, in miles

According to EPA the Average Annual Miles is 15,000 miles

§ 86.1865–12 (k) (4) *Requirements for the CO2 averaging, banking and trading (ABT) Program:*

As proposed by EPA , Credits/debits are to be calculated based on a fleet average vehicle miles traveled figure for all of industry as follows:

$$\text{CO2 Credits or Debits (Mg)} = \frac{[(\text{CO2 Standard} - \text{Manufacturer's Production-Weighted Fleet Average CO2 Emissions}) \times \text{Total Number of Vehicles Produced} \times \text{vehicle lifetime miles}]}{1 \text{ million}}$$






Where,

for passenger cars, vehicle lifetime miles = 195,264

for light trucks, vehicle lifetime miles = 225,865

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Vehicle type	Model		Average annual miles
Sports car	Carrera		~ 6577 miles
	Boxster		~ 7652 miles
	Cayman		
Sports sedan	Panamera		~ 9000 miles
SUV	Cayenne		~ 11000 miles

- Average annual miles of all Porsche cars are lower than the EPA's estimated average annual miles (ave. a mi) for the Industry of 15000 miles:
 - Sports cars mileages: **53%**
 - Sports sedan: **40%**
 - SUV: **27%**
 lower than the EPA's estimated average mileage.
- Hence, the **vehicle lifetime miles** (VLM) of all Porsche cars are smaller than the VLM considered by EPA to calculated the debits.
- Porsche customers emit under the consideration of real vehicle mileage less CO2 as calculated under the current GHG-rule.

EPA should modify the credit program so that deficits reflect real world manufacturer-specific lifetime vehicle miles traveled.

If a manufacturer can demonstrate to EPA that it's passenger car or light truck fleet vehicle lifetime mile numbers are less than the industry averages proposed for inclusion in the above formula, then the deficit should be reduced accordingly.