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Alternative Fuels Transportation Plan

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To: docket@energy.state.ca.us
From: Ben Knight, Honda R&D Americas, Inc.

Subject: Alternative Fuels Transportation Plan Comments

In the TIAX report, and for AB1007 TTW Report, the Fuel Cell Vehicle, Hydrogen, is assigned a Vehicle Energy Efficiency Ratio (EER) of 2.0. This value is out of date, as EPA certification data now exists for the 2005 and 2006 model year Honda FCX currently in the field.

EER for the Honda FCX would be at least 2.4, as evidenced below:

Honda FCX CAFÉ value (EPA combined f.e.) = 67 mpkg
Average PC CAFÉ value (EPA standard is 27.5 mpg) for comparison is 28 mpg, that is actually for a lighter and lower drag car, making the comparison conservative. (The FCX is over 3700 pounds, the 28 mpg gasoline PC is about 3500 pounds.)

$$\text{EER} = 67 / 28 = 2.4$$

Note:

- This is the only FCV with EPA certified f.e. values
- Next year, the EER of the new Honda FCX model will be higher as the new car is larger, the weight is reduced because the FC component weights are drastically reduced (390 pounds lighter FC power train), and the FC system efficiency is higher.

Therefore, an EER of 2.4 is justified. The EER of 2.0 is out of date and not supported by EPA certification data.

Thanks,
Ben Knight
Vice President, Honda R&D Americas