



Stage 1 Business Analysis

California Department of Technology, SIMM 19A.3 (Ver. 3.0.9, 02/01/2022)

1.1 General Information

1. Agency or State entity Name: 3900 - Air Resources Board, State

If Agency/State entity is not in the list, enter here with the [organization code](#).

N/A

2. Proposal Name and Acronym: Advanced Clean Cars (ACC) II ZEV Requirements Tracking System

3. Proposal Description: (Provide a brief description of your proposal in 500 characters or less.)

CARB proposes to create a system that provides a single, seamless web user interface for participant registration, zero-emission vehicle (ZEV) account management across Section 177 (§177) States and Manufacturers, and reporting and administration of the ZEV regulation, pursuant to California Code of Regulations, section 1962.4. This will verify if manufacturers that produce and deliver for sale passenger cars and light-duty trucks in California are complying with the Advanced Clean Cars II (ACC II) ZEV regulation.

4. Proposed Project Execution Start Date: 12/1/2023

5. S1BA Version Number: Version 1

1.2 Submittal Information

1. Contact Information

Contact Name: Joyce Wong

Contact Email: joyce.wong@arb.ca.gov

Contact Phone: 279-208-7716

2. Submission Type: **New Submission**

If a Withdraw, select Reason: [Choose an item.](#)

If Other, specify reason here: [Click or tap here to enter text.](#)

Sections Changed, if this is a Submission Update: (List all sections changed.)

[Click or tap here to enter text.](#)

Summary of Changes: (Summarize updates made.)

[Click or tap here to enter text.](#)

3. Attach [Project Approval Executive Transmittal](#) to your email submission.

4. Attach [Stage 1 Project Reportability Assessment](#) to your email submission.

1.3 Business Sponsorship

1. Executive Champion (Sponsor)

Title: [Deputy Executive Officer, Mobile Sources and Incentives](#)

Name: [Sydney Vergis](#)

Business Program Area: [CARB](#)

Title: [Division Chief](#)

Name: [Jennifer Gress](#)

Business Program Area: [Sustainable Transportation and Communities Division \(STCD\)](#)

Title: [Assistant Division Chief](#)

Name: [Annalisa Schilla](#)

Business Program Area: [STCD](#)

2. Business Owner

Title: [Air Resources Supervisor I](#)

Name: [Anna Wong](#)

Business Program Area: [ZEV Regulations Section](#)

3. Product Owner

Title: [Air Pollution Specialist](#)

Name: [Joyce Wong](#)

Business Program Area: ZEV Regulations Section

Title: Air Resources Engineer

Name: Cheng Zhou

Business Program Area: ZEV Regulations Section

TIP: Copy and paste or click the + button in the lower right corner on any section to add additional Executive Champions, Business Owners, or Product Owners with their related Business Program Areas as needed.

1.4 Stakeholder Assessment

The Stakeholder Assessment is designed to give the project team an overview of communication channels that the state entity needs to manage throughout the project. More stakeholders may result in increased complexity to a project.

1. Indicate which of the following are interested in this proposal and/or the outcome of the project. (Select 'Yes' or 'No' for each.)

State Entity Only: No

Other Departments/State Entities: Yes

Public: No

Federal Entities: No

Governor's Office: No

Legislature: No

Media: No

Local Entities: No

Special Interest Groups: No

Other: Yes

2. Describe how each group marked 'Yes' will be involved in the planning process.

State Entity Only: N/A

Other Departments/State Entities: §177 States choosing to adopt or have adopted ACC II will be collaborating with CARB to develop the technical requirements of the proposed system. They will also be testing the proposed system.

Public: N/A

Federal Entities: N/A

Governor's Office: N/A

Legislature: N/A

Media: N/A

Local Entities: N/A

Special Interest Groups: N/A

Other: Manufacturers will be using the system to report data and demonstrate compliance. We will solicit input on the functionality of the system, but do not expect to collaborate with them throughout the development of this proposal. However, it will be useful for them to test the proposed system in the end stages of this process.

1.5 Business Program

1. **Business Program Name:** ZEV Regulations Section

2. **Program Background and Context:** (Provide a brief overview of the entity's business program(s) current operations.)

For current ZEV regulation (referred to Advanced Clean Cars I or ACC I) implementation, CARB staff developed the Zero Emission Vehicle Credit Reporting and Data Tracking System (ZEV CRDTS) and uses this reporting system to track manufacturer compliance. The system is ten years old and was not built to support the size, complexity, and security needs of the ACC II. Additionally, the reporting requirements for ACC II ZEV regulation differ from ACC I and the ZEV CRDTS would require such significant changes to the order of operation by which it collects, calculates, and verifies compliance values.

3. **How will this proposed project impact the product or services supported by the state entity?**

An archive of ZEV CRDTS will need to be developed and incorporated into the proposed project. CARB staff, §177 States, and manufacturers will need to be trained on how to use the new system.

Currently for ZEV CRDTS, only one staff from the Office of Information Services (OIS) supports program staff with any changes that need to be made in the system backend. It usually takes 1-2 months before this staff can make the necessary changes due to competing priorities, which can delay submittals or approvals that need to be completed. This situation will become unsustainable for the proposed project if we cannot acquire more staff to support program staff.

TIP: Copy and paste or click the + button in the lower right corner to add Business Programs, with background and context and impact descriptions as needed.

1.6 Project Justification

1. **Strategic Business Alignment**

Enterprise Architect

Title: Information Technology Specialist III

Name: Dewayne Debbs

Strategic Plan Last Updated? Click or tap to enter a date.

Strategic Business Goal: Create a reporting system that will verify each manufacturer's compliance status for the ACC II ZEV Regulation

Alignment: This aligns with [Executive Order N-79-20](#) which states that "Passenger vehicle and truck regulations requiring increasing volumes of new zero-emission vehicles sold in the State towards the target of 100 percent of in-state sales by 2035."

TIP: Copy and paste or click the + button in the lower right corner to add Strategic Business Goals and Alignments as needed.

Mandate(s): State

Bill Number/Code, if applicable: [Executive Order N-79-20](#)

Add the Bill language that includes system-relevant requirements:

The State Air Resources Board, to the extent consistent with State and federal law, shall develop and propose:

- a) Passenger vehicle and truck regulations requiring increasing volumes of new zero-emission vehicles sold in the State towards the target of 100 percent of in-state sales by 2035.
- b) Medium- and heavy-duty vehicle regulations requiring increasing volumes of new zero-emission trucks and buses sold and operated in the State towards the target of 100 percent of the fleet transitioning to zero-emission vehicles by 2045 everywhere feasible and for all drayage trucks to be zero emission by 2035.
- c) Strategies, in coordination with other State agencies, U.S. Environmental Protection Agency and local air districts, to achieve 100 percent zero-emission from off-road vehicles and equipment operations in the State by 2035.

In implementing this Paragraph, the State Air Resources Board shall act consistently with technological feasibility and cost-effectiveness.

Bill Number/Code, if applicable: 13 CCR § 1962.4 Zero-Emission Vehicle Requirements for 2026 and Subsequent Model Year Passenger Cars and Light-Duty Trucks

Add the Bill language that includes system-relevant requirements:

In order to verify the status of each manufacturer's ZEV requirement performance for a given model year, each manufacturer shall submit a report to the Executive Officer annually, prior to May 1

of the calendar year following the close of the model year. The end-of-model-year report must contain the following information:

(A) Total number of light-duty vehicles produced and delivered for sale in California for the model year and each of the four prior model years.

(B) Data for each ZEV and PHEV, meeting the minimum requirements of subsections (e)(1), that was produced and delivered for sale for that model year including: vehicle identification number (VIN), model year, Executive Order number, make, model, test group, and state.

(C) Data for each individual ZEV and PHEV qualifying for additional environmental justice vehicle values of subsection (e)(2):

1. New ZEVs and PHEVs Provided for Use in Community-based Clean Mobility Programs at the first day of the model year through December 31 of the calendar year: VIN, model year, make, model, test group, Executive Order number of community-based clean mobility program, name of community-based clean mobility program, MSRP, sales price for the vehicle, date of sale or lease, and copy of the vehicle purchase agreement.

2. Vehicles in California Sold At the End of Lease to Participating Dealerships in January 1 through December 31 of the calendar year: VIN, make, model, test group, MSRP, odometer reading at time of sale, participating dealer name, participating dealer address, date vehicle sold to a participating dealer. Vehicles in California sold at the end of lease to a financial assistance program participant: VIN and date of sale.

3. New ZEVs and PHEVs below MSRP threshold: VIN, model year, make, model, test group, and MSRP.

(D) Calculation of the manufacturer's ZEV requirement performance including separate calculations of any PHEV or environmental justice vehicle values earned in the model year in excess of the respective allowances.

TIP: Copy and paste or click the + button in the lower right corner to add Bill Numbers/Codes and relevant language as needed.

2. Business Driver(s)

Financial Benefit: No

Increased Revenue: No

Cost Savings: No

Cost Avoidance: No

Cost Recovery: No

Will the state incur a financial penalty or sanction if this proposal is not implemented? No

If the answer to the above question is "Yes," please explain:

NA

Improvement

Better Services to the People of California: No

Efficiencies to Program Operations: Yes

Improved Equity, Diversity, and/or Inclusivity: No

Improved Health and/or Human Safety: No

Improved Information Security: Yes

Improved Business Continuity: Yes

Improved Technology Recovery: No

Technology Refresh: Yes

Technology End of Life: No

1.7 Business Outcomes Desired

Executive Summary of the Business Problem or Opportunity:

For current ZEV regulation implementation, CARB staff developed ZEV CRDTS and uses this reporting system to track manufacturer compliance. The system is ten years old and was not built to support the size, complexity, and security needs of the ACC II. Additionally, the reporting requirements for ACC II ZEV regulation differ from current ZEV requirements (ACC I) and the old system would require such significant changes to the order of operation by which it collects, calculates, and verifies values, it would likely not be cost effective to do so.

Currently, 15 states have adopted the ACC I ZEV regulation, which includes New York, New Jersey, Maine, Massachusetts, Maryland, Rhode Island, Oregon, Vermont, Colorado, Connecticut, Washington, Minnesota, Nevada, Virginia, and New Mexico. Many of these States have also adopted, or plan to adopt, ACC II ZEV regulations, which benefits California because manufacturers are more likely to be able to comply with a unified ZEV standard. CARB will benefit from a unified ACC II compliance reporting tool and corresponding data storage for California and the §177 states because it will streamline compliance assessment. This compliance reporting tool would build on a successful and streamlined process ushered in during ACC I compliance. Moreover, having a common reporting tool and process in place will create major efficiencies for states and manufacturers alike. Newly adopted ACC II provisions will require robust verification across large datasets, including checking individual vehicle identification numbers reported for every ZEV and PHEV in California and each §177 state. Additionally, building a platform that can be used by multiple jurisdictions also facilitates future linkage opportunities.

Without a robust reporting tool such as the one proposed, CARB will be unable to verify each manufacturer's compliance status for the ACC II ZEV regulation. This would put more burden on CARB staff, other States that administer California's ZEV regulation, and manufacturers, and reducing the likelihood that California's ZEV regulation would deliver the expected emission benefits.

Objective ID: 1.1

Objective: Efficiencies to program operations. ZEV Regulations Section: Currently, manufacturers report the vehicle name and units delivered for sale in the ZEV CRDTS to CARB staff and §177 states through ZEV CRDTS. For model year 2022, approximately 80 individual vehicle models were reported. This number of individual vehicles is projected to increase drastically due to increased ZEV requirement imposed by ACC II. However, ACC II will require manufacturers to report vehicle identification numbers (VINs) of ZEVs delivered for sale in each state, which is optional currently and emailed to CARB via Excel spreadsheets. We want to continue providing a platform for manufacturers to efficiently report vehicles delivered for sale but account for the increased volume of reporting and eliminate the need of collecting VINs via Excel spreadsheets.

Metric: Number of spreadsheets received by CARB staff and §177 states.

Baseline: For CA: current spreadsheet counts approximately 20, records contained in all spreadsheets approximately 280,000.

Target Result: Number of spreadsheets from manufacturers: 0, number of errors to record all VINs into proposed new reporting system: <1

Objective ID: 1.2

Objective: Efficiencies to program operations. ZEV Regulations Section: Verify that the VINs submitted by manufacturers match with the VINs in the DMV database. Currently, the only way to verify this information is downloading a spreadsheet of VINs from the DMV database and manually cross checking it with the spreadsheets submitted by manufacturers. This increases the amount of staff time and room for error. The proposed project could provide a way to check if VINs match by providing a secure way to upload the spreadsheet from the DMV database and automatically cross check if the VINs match what the manufacturers reported.

Metric: Number of spreadsheets generated.

Baseline: For CA: current spreadsheet counts approximately 40, records contained in all spreadsheets approximately 560,000 (number is combined - both DMV and submittals from manufacturers), numbers projected to grow.

Target Result: Number of spreadsheets from manufacturer: 0, number of errors from cross checking in proposed new reporting system: <1

Objective ID: 1.3

Objective: Efficiencies to program operations. ZEV Regulations Section: E-cert, a CARB database maintained by the Emissions Compliance and Certification Division contains certification data for light-duty ZEVs, which is essential for verifying ZEV regulation compliance. Staff utilizes

this data to validate that vehicles reported by manufacturers are certified for California's emission requirements before approving that the manufacturer has demonstrated compliance with the regulation. The current process is obtaining this data from the E-cert team and uploading the Excel spreadsheet into the system. This is inefficient because if there are changes to the E-cert database, those changes are not reflected. The old data will have to be manually removed and new spreadsheet must be uploaded. Ideally, synchronizing with the E-cert database with the proposed project will reduce room for error.

Metric: Number of spreadsheets that need to be uploaded or re-uploaded, number of errors from staff manually cross checking the E-cert data, number of re-uploads due to data changes in E-cert.

Baseline: 3 spreadsheets

Target Result: Number of spreadsheets from E-cert team: 0, number of errors due to synchronizing the database: <1, number of re-uploads: 0

Objective ID: 1.4

Objective: Efficiencies to program operations. ZEV Regulations Section: ZEV CRDTS is a platform that manufacturers can access from one portal and log-in with their unique credentials to report their vehicles for CA and all the §177 states. The current process relies on ZEV CRDTS to provide the manufacturers an efficient way to report their vehicles to CARB and all the states in one place. The proposed project should continue to follow this model to ensure that manufacturers do not have to send a spreadsheet to each state.

Metric: Number of users (manufacturers)

Baseline: Approximately 20 users

Target Result: Approximately 20 users affiliated with manufacturers can access the proposed project through a log-in and report their data for all states.

Objective ID: 1.5

Objective: Efficiencies to program operations. ZEV Regulations Section: ZEV CRDTS provides §177 states a streamlined platform that allows each state to verify manufacturer compliance with the ZEV regulation. Like the manufacturers, the states can access one portal with all the manufacturer's submittals and log-in with their unique credentials. Without building a new system that provides the same functionality, the states will have to create their own reporting system, or request manufacturers provide it to them via spreadsheets. This created extra burden on the States, and could limit their ability to adopt the ZEV standards moving forward.

Metric: Number of users (§177 state administrators)

Baseline: Approximately 24 users

Target Result: Approximately 24 users affiliated with the §177 states will be able to access the proposed project through a log in and track manufacturer compliance with the ACC II ZEV regulation.

Objective ID: 1.6

Objective: Efficiencies to program operations. ZEV Regulations Section: In ZEV CRDTS, staff cannot make small adjustments for manufacturers allowed within the ZEV regulation, such as same model year calculation method in a specific state. When the same model year calculation method checkbox is toggled, it enables it for all states. This results in program staff producing Excel spreadsheets that need to be sent to the program developer to manually adjust the value to reflect the same model year calculation. These manual adjustments create more room for error and results in excessive staff time.

Metric: Number of spreadsheets produced and sent to the program developer to correct errors

Baseline: Approximately 10 spreadsheets per year

Target Result: 0 spreadsheets from program staff, errors from manual adjustment: <1

Objective ID: 1.7

Objective: Efficiencies to program operations. ZEV Regulations Section: ZEV CRDTS will not be able to support the size, complexity, and security needs of the ACC II. Additionally, the reporting requirements for ACC II ZEV regulation differ from ACC I and the old system would require such significant changes to the order of operation by which it collects, calculates, and verifies compliance values.

Metric: Number of users (§177 state administrators and manufacturers.

Baseline: Approximately 44 users.

Target Result: Approximately 24 users affiliated with the §177 states will be able to track compliance in accordance to the ACC II ZEV regulations and approximately 20 users affiliated with the manufacturers will be able to report their data in accordance with the ACC II ZEV regulation.

TIP: Copy and paste or click the + button in the lower right corner to add Objectives as needed. Please number for reference.

TIP: Objectives should identify WHAT needs to be achieved or solved. Each objective should identify HOW the problem statement can be solved and must have a target result that is specific, measurable, attainable, realistic, and time-bound. Objective must cover the specific. Metric and Baseline must detail how the objective is measurable. Target Result needs to support the attainable, realistic, and time-bound requirements.

1.8 Project Management

1. Project Management Risk Score: 0.2

(Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix A Project Management Risk Assessment Template](#) to the email submission.)

2. Project Approval Lifecycle Completion and Project Execution Capacity Assessment

Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants, or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

Answer: [Yes](#)

Does the Agency/state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

Answer (No, New, Existing, or Both): [New Processes](#)

1.9 Initial Complexity Assessment

1. Business Complexity Score: [3.5](#)

(Attach a completed [SIMM Section 45 Appendix C](#) to the email submission.)

2. Noncompliance Issues: (Indicate if your current operations include noncompliance issues and provide a narrative explaining how the business process is noncompliant.)

Programmatic regulations: [No](#)

HIPAA/CIIS/FTI/PII/PCI: [No](#)

Security: [No](#)

ADA: [No](#)

Other: [No](#)

Not Applicable: [No](#)

Noncompliance Description:

[N/A](#)

3. Additional Assessment Criteria

If there is an existing Privacy Threshold Assessment/Privacy Information Assessment, include it as an attachment to your email submission.

How many locations and total users is the project anticipated to affect?

Number of locations: [32 locations, 74 total users](#)

Estimated Number of Transactions/Business Events (per cycle): [3,973,117](#)

Approximate number of internal end-users: [3](#)

Approximate number of external end-users: [71](#)

1.10 Funding

Planning

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to **complete planning** through the project approval lifecycle framework? [Yes](#)

If Yes, when will a budget action be submitted to your Agency/DOF for planning dollars?

[6/22/2023](#)

2. Please provide the Funding Source(s) and dates funds for planning will be made available:

[STCD Budget - \\$1.5 million \(FY 23-24\)](#)

[Inflation Reduction Act \(IRA\) – Funding from Section 177 States ~ \\$5 million](#)

Project Implementation Funding

1. Has the funding source(s) been identified for **project implementation**? [Yes](#)

If known, please provide the Funding Source(s) and dates funds for implementation will be made available:

[STCD Budget - \\$1.5 million \(FY 23-24\)](#)

[Inflation Reduction Act \(IRA\) – Funding from Section 177 States ~ \\$5 million](#)

Will a budget action be submitted to your Agency/DOF? [Yes](#)

If “Yes” is selected, specify when this BCP will be submitted: [July 2023](#)

2. Please provide a rough order of magnitude (ROM) estimate as to the total cost of the project: [Less than \\$10 Million](#)

End of agency/state entity document.

Please ensure ADA compliance before submitting this document to CDT.

When ready, submit Stage 1 and all attachments in an email to ProjectOversight@state.ca.gov.

Department of Technology Use Only

Original "New Submission" Date: 11/13/2023

Form Received Date: 11/13/2023

Form Accepted Date: 11/13/2023

Form Status: [Completed](#)

Form Status Date: 11/13/2023

Form Disposition: [Approved](#)

If Other, specify: [Click or tap here to enter text.](#)

Form Disposition Date: 11/13/2023

Department of Technology Project Number (0000-000): 3900-079