

Mary T. Barra
Chair & Chief Executive Officer

June 8, 2021

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Regan,

You recently received a letter from Senator Carper, dated April 29, 2021, requesting that EPA adopt greenhouse gas emissions regulations for the light-duty vehicle fleet through Model Year (MY) 2026 that mirror the standards established under voluntary agreements reached by California and a selection of automakers in 2019 (“California framework”). The letter also called on EPA to establish standards for MY2027 and later that would expect ambitious progress by industry toward our shared and ultimate goal of an all-electric future.

General Motors (GM) has discussed these issues with many stakeholders and we appreciate that all parties are focused on achieving the greenhouse gas reductions envisioned by the California framework. GM supports the emission reduction goals of California through MY26 and believes that the same environmental benefits can and should be achieved through a high-volume electric vehicle pathway that will set the industry on a stronger trajectory to greater GHG reductions in MY2027 and later. The auto industry is embarking upon a profound transition as we do our part to achieve the country’s climate commitments. While some automakers are choosing to make new investments in intermediary technologies like hybrids and plug-in hybrids, others, such as GM, have chosen to invest early in our business transformation and are already committed to a pure battery-electric, zero emissions vehicle line-up. In order to accelerate electrification, we believe establishing an EV compliance pathway, in addition to the hybrid reliant path of some, would catapult our nation forward to achieve the targets established in the Paris Agreement.

GM Is Making Substantial Progress Toward its Goal of an All-Electric Future

Every day we are moving GM closer to an all-electric future. We have committed more than \$27 billion to EV and AV development, with plans to launch more than 30 EVs globally by the end of 2025. In the United States we have announced more than \$9 billion in manufacturing investments to manufacture the vehicles and battery cells in Michigan, Ohio, and Tennessee. Even as we manage short-term challenges like COVID-19 and the semiconductor shortage, we continue to accelerate our investment in electric vehicles. We have made significant strides towards an all-electric future, most recently announcing new vehicles, technological breakthroughs, and efforts to make the charging experience seamless for customers, including:

- Launching the redesigned Chevrolet Bolt EV and new Bolt EUV built in Orion, Michigan.
- Announcing a high-volume battery-electric Silverado, built at Factory Zero in Detroit-Hamtramck for both fleet and retail customers, with a GM-estimated 400 miles of range on a full charge for certain configurations.
- Unveiling the production version of the Tennessee-built Cadillac LYRIQ nine months earlier than planned because of our virtual engineering and software expertise.
- Unveiling both the GMC HUMMER EV and a GMC HUMMER EV SUV to be built at Factory Zero in Detroit- Hamtramck.
- Introducing BrightDrop, a business created to help commercial delivery fleets maximize productivity, improve safety, and reduce their carbon footprint. We are on track to begin delivering EV600 vans to our first customer, FedEx Express, later this year.
- Announcing Ultium Cells LLC, our joint venture with LG Energy Solution, will begin construction of a new battery cell plant in Spring Hill, Tennessee. It will open in 2023, a year after our Lordstown, Ohio cell plant. Combined these facilities will create over 2,000 new jobs.
- We signed a joint development agreement and increased our investment in SolidEnergy Systems, one of several companies we are working with to help commercialize lithium-metal batteries, which have incredible potential to deliver even better EV performance, more range and lower costs for customers.
- We will build two large EVs for Honda using our Ultium technology – one SUV for the Honda brand, and one for the Acura brand.
- We introduced Ultium Charge 360, an innovative and holistic approach that integrates charging networks with our mobile apps and other products and services to simplify the charging experience for our EV customers. Through this initiative we are offering customers access to more than 60,000 plugs across the U.S. and Canada.

This is extraordinary progress, with much more to come.

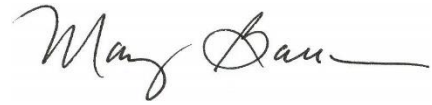
[An EV Compliance Pathway Supports the EV Investments Needed to Meet Climate Goals](#)

These commitments towards an all-electric future demonstrate GM's seriousness in achieving the environmental benefits envisioned by the CA framework. GM is committed to working constructively with EPA and CARB to achieve those benefits, following an electric vehicle compliance pathway that focuses on EVs in MY2025-26 and recognizes the investments and leadership made by GM with its early, committed focus on EVs. Establishing a compliance pathway for companies that have invested in an EV future early and can comply with higher-level performance standards in the later part of the program through increased sales of pure EV vehicles will encourage mass adoption and help the U.S. claim a leadership position in electrification. We believe an electric vehicle compliance pathway is a key component to setting the industry on an irreversible path towards a zero-emissions future, which can only be achieved with a tailpipe-free light duty fleet. This pathway would also provide the needed time for critical investment in charging infrastructure. It would provide a strong foundation for the industry to meet the needed reductions to meet Paris Climate objectives and provide a model for the next set of regulations targeting 2027-2035 which will need to focus on full battery electric vehicle deployment.

An electric vehicle compliance pathway is aligned with the greenhouse gas reductions of the CA framework, with GM's commitment to Paris-aligned science-based targets, with the Biden Administration's EV goals, and with Senator Carper's vision of stronger standards post MY2026. GM will continue to focus on working with the Biden Administration and California on regulations and complementary EV policies that will support the industry's transition to zero emissions. We appreciate Senator Carper highlighting our effort in 2018 to redirect the focus of future regulation to address how to make an all-electric vehicle future a reality. GM remains focused on achieving a National EV Policy that supports U.S. leadership in this transition.

We look forward to working with you and your staff at EPA, and with NHTSA and CARB to craft regulations that achieve our shared goal of emission reductions, while also working with all stakeholders on a National EV policy effort that focuses on complementary policies to support the greater adoption of EVs (Incentives, Infrastructure and Investment).

Sincerely,

A handwritten signature in black ink that reads "Mary Lau" followed by a horizontal flourish.